

Appendix

No. 6

PA TRS Information – ATT Service Provider

Appendix

No. 6.1

ATT Assertion of Compliance with Minimum Standards

COMMONWEALTH OF PENNSYLVANIA
STATE RELAY CERTIFICATION 2008-2013
SEPTEMBER 2007

§64.604 MANDATORY MINIMUM STANDARDS

The standards in this section are applicable December 18, 2000, except as stated in paragraphs (c)(2) and (c)(7) of this section.

(a) Operational standards—(1) Communications assistant (CA). (i) TRS providers are responsible for requiring that all CAs be sufficiently trained to effectively meet the specialized communications needs of individuals with hearing and speech disabilities.

In keeping with all federally mandated requirements, Pennsylvania's required minimum skills for employment of Communications Assistants are:

- Minimum typing speed of 60 wpm (FCC mandated requirement)
- Spelling and grammatical accuracy at high school graduate level
- Ability to translate typed ASL to English (as measured by a CA proficiency test)
- Good pronunciation and voice intonation
- Awareness of deaf community and culture (training developed by AT&T)
- Spanish Language Certification (For Spanish Language CA job only)

(ii) CAs must have competent skills in typing, grammar, spelling, interpretation of typewritten ASL, and familiarity with hearing and speech disability cultures, languages and etiquette. CAs must possess clear and articulate voice communications.

Pennsylvania Relay CAs are provided specific instruction on cross-cultural communication, customer service, conversational etiquette, ergonomics and technical development as part of their orientation. Additional information is provided periodically to refresh and inform their knowledge base. Pennsylvania Relay CAs are also specially trained to recognize specific speech disabilities and speech patterns to efficiently facilitate Speech-to-Speech calls. Center managers conduct monthly observations of CA performance at the workstation while a call is in progress. In addition, CAs are asked to sign an agreement of confidentiality and ethics regarding customer communications and call handling. These agreements are retained in their personnel files and reviewed annually.

(iii) CAs must provide a typing speed of a minimum of 60 words per minute. Technological aids may be used to reach the required typing speed. Providers must give oral-to-type tests of CA speed.

In keeping with federal requirements, an oral-to-type diagnostic is administered to each CA annually. Currently, all AT&T Relay CAs processing Pennsylvania relay calls meet/exceed the minimum FCC typing speed requirement. The average 2007 CA typing speed is 68.5 words per minute.

(iv) TRS providers are responsible for requiring that VRS CAs are qualified interpreters. A "qualified interpreter" is able to interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary.

The Commonwealth of Pennsylvania does not currently offer Video Relay Services, however our provider, AT&T Relay Services, does. Their vendor employs only qualified interpreters with appropriate professional certification.

(v) CAs answering and placing a TTY-based TRS or VRS call must stay with the call for a minimum of ten minutes. CAs answering and placing an STS call must stay with the call for a minimum of fifteen minutes.

All AT&T Relay CAs processing Pennsylvania calls are required to stay with a call for at least 10 minutes before an in-call transfer can take place. The time for in-call replacement for Speech to Speech calls is a minimum of 15 minutes. In either case, the CA informs both parties of the relief, with the exception of Two Line VCO where only the VCO user is notified of the relief CA. These procedures comply with the FCC requirements for in call replacement.

(vi) TRS providers must make best efforts to accommodate a TRS user's requested CA gender when a call is initiated and, if a transfer occurs, at the time the call is transferred to another CA.

All Relay CAs processing calls for Pennsylvania are instructed to accommodate customer requests for a specific CA gender to the best of their ability. When a customer makes a specific request for a male or female CA, the CA will attempt to transfer to an appropriate CA, and/or call their Supervisor for assistance in complying with the request. The same effort is demonstrated when a CA is replaced during the call. CAs are provided with detailed procedures of how to handle such requests and inform the caller of all related actions taken. Please be aware the vast majority of our Relay employees are female. Below are CA procedures for handling a specific gender request:

- If customer requests CA of a different gender, they are asked to hold while CA checks requested gender availability with In-charge Supervisor
- If the requested gender is available, the CA will say or type, "Thank you for holding. We are able to accommodate your request. I am transferring your call now. One moment please."
- If requested gender is not available, the In-charge supervisor will advise the CA. The CA will say or type, "Thank you for holding. I'm sorry, at this time we do not have a male/female CA available for your call. I would be happy to complete your call for you now, or you may want to try your call later."
- The CA will be guided by the customer's response. If the customer requires further assistance, the CA will courteously advise the customer that he/she will be transferred to the In-charge Supervisor for assistance.

(vii) TRS shall transmit conversations between TTY and voice callers in real time.

Pennsylvania Relay CAs transmit conversations between TTY and voice callers in real time as mandated by the FCC. The standard voice caller communicates with the CA by voice. The CA simultaneously relays the conversation verbatim (including background information and voice tone descriptive words) to the TTY user by typing on a computer keyboard. The Relay operator then reads the response from the TTY user, which appears on the screen of their computer monitor, and voices it to the standard voice user.

(2) Confidentiality and conversation content. (i) Except as authorized by section 705 of the Communications Act, 47 U.S.C. 605, CAs are prohibited from disclosing the content of any relayed conversation regardless of content, and with a limited exception for STS CAs, from keeping records of the content of any conversation beyond the duration of a call, even if to do so would be inconsistent with state or local law. STS CAs may retain information from a particular call in order to facilitate the completion of consecutive calls, at the request of the user. The caller may request the STS CA to retain such information, or the CA may ask the caller if he wants the CA to repeat the same information during subsequent calls. The CA may retain the information only for as long as it takes to complete the subsequent calls.

(ii) CAs are prohibited from intentionally altering a relayed conversation and, to the extent that it is not inconsistent with federal, state or local law regarding use of telephone company facilities for illegal purposes, must relay all conversation verbatim unless the relay user specifically requests summarization, or if the user requests interpretation of an ASL call. An STS CA may facilitate the call of an STS user with a speech disability so long as the CA does not interfere with the independence of the user, the user maintains control of the conversation, and the user does not object. Appropriate measures must be taken by relay providers to ensure that confidentiality of VRS users is maintained.

The Commonwealth of Pennsylvania and AT&T Relay Services view customer privacy and communication privacy as one of the most critical priorities for the relay customer. AT&T Relay CAs are required to hold all customer conversation and information in the strictest confidence, and are prohibited from discussing customer calls. As a condition of their employment with us, AT&T Relay CAs are required to sign a Confidentiality agreement, and a Code of Ethics. The agreement is reviewed with all employees regularly, and the agreement is retained in their personnel file. As part of AT&T corporate integrity program, entitled "Our Code of Business Conduct", privacy of customer communications is again reviewed. Confidentiality and privacy of communications is a relay priority, and an AT&T priority. No records of conversations are retained. CAs are also prohibited from interjecting any advice, counsel, or personal opinions. CAs are prohibited from retaining any records or information from any calls, except when requested by a STS customer for the completion of future calls. Breaches of confidentiality have serious consequences. All of our employees understand the critical nature of their responsibilities.

(i) Consistent with the obligations of telecommunications carrier operators, CAs are prohibited from refusing single or sequential calls or limiting the length of calls utilizing relay services.

(ii) Relay services shall be capable of handling any type of call normally provided by telecommunications carriers unless the Commission determines that it is not technologically feasible to do so. Relay service providers have the burden of proving the infeasibility of handling any type of call.

	VCO to Text	VCO to HCO
VCO with Privacy	Hearing to Hearing	HCO to VCO
Text to HCO	HCO with Privacy	Speech to Speech
HCO to Text	Two Line VCO	Spanish to Spanish
VCO to VCO	HCO to HCO	Two Line HCO
Pay per Call (900 calls)		

In addition to the above call types, Pennsylvania Relay provides TTY to TTY with Voice Intercept (TTVI) relay calls. This call type assists one TTY user trying to reach another TTY user with the assistance of a CA, such as terminating to a hotel or hospital switchboard. Once the switchboard transfers the call to the requested extension and another TTY connects, the call becomes a TTY to TTY connection. In many states, this call is not acknowledged as a relay call and would not be completed. In Pennsylvania the CA remains with the call so the connection is maintained and the minutes are billed to the state as relay minutes.

Pennsylvania allows the out of state use of the relay service, a practice known as "roaming". This allows Pennsylvania residents traveling outside the state to dial into Pennsylvania relay service to complete calls if they prefer. Instead of dialing 7-1-1, individuals can use toll free numbers to access the Pennsylvania center. This portability of the service also prevents billing problems associated with wireless 7-1-1 access where a caller's ANI may not appear as a Pennsylvania area code.

(iii) Relay service providers are permitted to decline to complete a call because credit authorization is denied.

The Pennsylvania Relay Service will decline relay calls where appropriate calling/credit card information cannot be obtained or when collect charges are denied. In these instances the relay caller is asked if they would like to bill their call in an alternate way.

(iv) Relay services shall be capable of handling pay-per-call calls.

Pennsylvania Relay currently meets all FCC and Commonwealth requirements regarding the processing of relay pay per call services. In addition, AT&T is the only relay provider that allows customers to access pay per call services via 711 dialing. This capability is afforded by our state-of-the-art relay platform, which is able to pass a customer's number (ANI) to the network for direct billing at the pay-per-call provider's established rates. Consequently, Pennsylvania Relay users are able to make outbound relay calls to pay-per-call services in their mode of choice, i.e., multiple state and national toll free 8YY, 900, 711, 211, or 511 numbers.

(v) TRS providers are required to provide the following types of TRS calls: (1) Text-to-voice and voice-to-text; (2) VCO, two-line VCO, VCO-to-TTY, and VCO-to-VCO; (3) HCO, two-line HCO, HCO-to-TTY, HCO-to-HCO.

Pennsylvania Relay Service is fully compliant with this requirement, and can complete all of these calls as previously indicated. (See list provided 3.ii)

(vi) TRS providers are required to provide the following features: (1) Call release functionality; (2) speed dialing functionality; and (3) three-way calling functionality.

Pennsylvania Relay Service provides these features to all relay users, via the AT&T Relay platform technology. CAs can "release" TTY-TTY calls after connection as required, as well as speed dialing via personalized frequently-called numbers lists requested by customers. Additionally, Pennsylvania Relay users enjoy three-way calling any time via the use of their flash button, with the CA then relaying the three-way call.

(vii) Voice mail and interactive menus. CAs must alert the TRS user to the presence of a recorded message and interactive menu through a hot key on the CA's terminal. The hot key will send text from the CA to the consumer's TTY indicating that a recording or interactive menu has been encountered. Relay providers shall electronically capture recorded messages and retain them for the length of the call. Relay providers

may not impose any charges for additional calls, which must be made by the relay user in order to complete calls involving recorded or interactive messages.

Since May 2002, all AT&T Relay center CA workstations have been equipped with an AT&T proprietary play back device to capture audio messages, recordings, or interactive voice systems. The relay user is immediately informed by a CA "hot key" that an answering machine, a pre-recorded message or a multiple choice voice menu has been encountered. The CA is able to record the information and facilitate the relay of the information. This allows Pennsylvania Relay to provide, as a TRS feature, answering machine and voice mail retrieval. This same procedure can also be used with the relay of pay-per-call (e.g. 900, 976 calls). No records are kept of such calls as recordings are retained and used for each specific call. In the event a second call is required to retrieve messages or respond to menu systems, there is no additional charge to the relay user.

(viii) TRS providers shall provide, as TRS features, answering machine and voice mail retrieval.

Pennsylvania Relay has the ability to retrieve messages from answering machines at the same location or from remote location answering machines. This procedure is called Single Line Answering Machine (Slam). Special training for SLAM calls include:

- Requesting any access codes or passwords in advance
- Following all instructions
- Informing the customer fully of the progress of the call

Pennsylvania Relay can also provide the TTY user answering machine messages when the customer requests that the messages be retrieved by laying his/her phone down by the answering machine. The CA instructs the TTY user to turn on the answering machine and lay the phone near it. Once all messages have been retrieved, they are then typed to the TTY user.

(4) Handling of emergency calls. Providers must use a system for incoming emergency calls that, at a minimum, automatically and immediately transfers the caller to an appropriate Public Safety Answering Point (PSAP). An appropriate PSAP is either a PSAP that the caller would have reached if he had dialed 911 directly, or a PSAP that is capable of enabling the dispatch of emergency services to the caller in an expeditious manner.

Emergency Calls, §64.604 A.4

Pennsylvania Relay emergency call handling procedures are fully compliant with the FCC requirements as mandated in FCC Order 03-121 released on June 16, 2003.

AT&T provides Relay CAs with immediate and direct access to a database that contains emergency agency listings based on the caller's Automatic Number Identification (ANI). If this number does not appear in the database it may be necessary to contact Directory Assistance. Using the caller's ANI, the CA can quickly secure the appropriate emergency agency listing and complete the relay call allowing for immediate emergency attention. Upon identification or receipt of the emergency number, the CA performs only two key strokes to initiate the call to the emergency agency. With Caller ID technology, the emergency agency will automatically receive the ANI of the relay caller, eliminating the need for the CA to manually pass this information.

Once the appropriate emergency agency answers, the CA informs the dispatcher that the call is coming through the relay service and indicates whether the call is voice or TTY. The CA remains available to the emergency agency to provide any additional assistance as necessary or required in order to ensure the rendering of immediate emergency service. Each emergency call is given the Relay Operator's undivided attention. Typically, a supervisor will be immediately assigned to work with the Relay Operator in any emergency call situation. CAs are instructed to do everything they can to ensure emergency services are rendered, including stepping outside of the CA role if required to relay information to the PSAP. In the event of a critical situation, CAs are also offered a debriefing opportunity with their supervisor after the call is completed. Under no circumstances are emergency calls transferred to another workstation.

(5) STS called numbers. Relay providers must offer STS users the option to maintain at the relay center a list of names and telephone numbers which the STS user calls. When the STS user requests one of these names, the CA must repeat the name and state the telephone number to the STS user. This information must be transferred to any new STS provider.

STS Called Numbers, §64.604 A.5

All AT&T Relay CAs are provided training and methodology for processing Speech to Speech (STS) relay calls, especially in the event a STS caller elects to dial 711 to reach the service. STS training consists of an introduction

to the history of the service, practice on methods and procedures for this call type, presentation of a video with noted STS founder Dr. Segalman using listening skills that enable the CA to understand what he is saying. Typically, STS calls are routed to our National STS team for handling.

(b) Technical standards—(1) ASCII and Baudot. TRS shall be capable of communicating with ASCII and Baudot format, at any speed generally in use.

B. Technical Standards:

Transmission Modes, ASCII & Baudot, §64.604 B.1

Pennsylvania Relay's transmission circuits meet or exceed FCC and Inter-exchange Carrier performance standards. Pennsylvania Relay is capable of communications in Baudot format at a speed of 45.5, in Turbo Code at a speed of 100, and at an ASCII speed of 300-2400 words per minute. Requirements for Baudot, ASCII, and Turbo Code appear in Attachment C.2.b and C.2.e of the current Pennsylvania Relay service contract.

(2) Speed of answer. (i) TRS providers shall ensure adequate TRS facility staffing to provide callers with efficient access under projected calling volumes, so that the probability of a busy response due to CA unavailability shall be functionally equivalent to what a voice caller would experience in attempting to reach a party through the voice telephone network.

(ii) TRS facilities shall, except during network failure, answer 85% of all calls within 10 seconds by any method which results in the caller's call immediately being placed, not put in a queue or on hold. The ten seconds begins at the time the call is delivered to the TRS facility's network. A TRS facility shall ensure that adequate network facilities shall be used in conjunction with TRS so that under projected calling volume the probability of a busy response due to loop trunk congestion shall be functionally equivalent to what a voice caller would experience in attempting to reach a party through the voice telephone network.

(A) The call is considered delivered when the TRS facility's equipment accepts the call from the local exchange carrier (LEC) and the public switched network actually delivers the call to the TRS facility.

(B) Abandoned calls shall be included in the speed-of-answer calculation.

(C) A TRS provider's compliance with this rule shall be measured on a daily basis.

(D) The system shall be designed to a P.01 standard.

(E) A LEC shall provide the call attempt rates and the rates of calls blocked between the LEC and the TRS facility to relay administrators and TRS providers upon request.

Speed of Answer, §64.604 B.2

AT&T Relay currently maintains adequate employee staffing to ensure that, under projected call volumes, the probability of a busy response due to CA unavailability will be equivalent to what a voice caller would experience in attempting to reach a party through the voice telephone network.

Per FCC mandates, the Commonwealth of Pennsylvania and AT&T Relay service standards require that CAs must answer 85% of all incoming calls in 10 seconds. The call is considered delivered when the AT&T Relay equipment accepts the call from the local exchange carrier (LEC) and the public switched network actually delivers the call to the Relay Center. Abandoned calls, per FCC mandate, are included in this calculation.

The following table shows the reported speed of answer data for the past five calendar years:

Calendar Year*	Answered in 10 sec. (%)	Average Speed of Answer (sec)	Calculation Method
2003	96% - Met	2.25 secs. - Met	Daily Average
2004	94% - Met	3.18 secs. -Met	Daily Average
2005	92% - Met	3.85 secs. --Met	Daily Average
2006	94% - Met	2.87 secs. -Met	Daily Average
2007	93% - Met	3.51 secs. - Met	Daily Average

** Reflects data for Jan 2007 through July 2007.

AT&T's Relay center platform is engineered for a P.01 grade of service, wherein blockage rate will be measured by sampling the number of calls being blocked for each 24 hour period. If a call rings or is in queue/hold in excess of 90 seconds, it is to be considered a blocked call. Reports of less than 1 in 100, the functional equivalent of the blockage rate for voice users, indicate Pennsylvania Relays full compliance with the FCC requirement for a P.01 standard.

(iii) Speed of answer requirements for VRS providers are phased-in as follows: by January 1, 2006, VRS providers must answer 80% of all calls within 180 seconds, measured on a monthly basis; by July 1, 2006, VRS providers must answer 80% of all calls within 150 seconds, measured on a monthly basis; and by January 1, 2007, VRS providers must answer 80% of all calls within 120 seconds, measured on a monthly basis. Abandoned calls shall be included in the VRS speed of answer calculation.

The Commonwealth of Pennsylvania offers Video Relay Service via AT&T's program, AT&T Video Relay Services. Current data as supplied by AT&T and their contractor indicate that VRS is compliant with FCC regulations.

(3) Equal access to interexchange carriers. TRS users shall have access to their chosen interexchange carrier through the TRS, and to all other operator services, to the same extent that such access is provided to voice users.

Equal Access to Interexchange Carriers, §64.604 B.3

Relay user access to a preferred interexchange carrier (IXC), more commonly referred to as Carrier of Choice (COC), has improved dramatically over the past five years. Currently Pennsylvania Relay callers have access to numerous participating carriers, including the following IXCs:

AT&T	Adelphia	Allegiance	Alliance	Amerivision
BellSouth	BroadWing	BusTelecom	CloseCall	CirChoie5TK
ComTech	CoreComm	Cox (Bus)	Cox (Res)	Eastern Tel
Easton	Excel	Excel1010	Frontier	GlobalCrossing
I-Link	Incomnet	LD Whse	LDDS	LDM Sys
LightYear	MCI	Matrix Tel	MetroMedia	North Amer
OneCall	OpenBand	OpexLD	Pembroke	PhoneTel
Primus Tel	Qwest	SBC	Sprint	TalkAmerica
Telecom	Touch1	Vartec	Verizon V2	Verizon
VSS1	Wiltel	WorldXchg	Worldwide	Z-Tel
Zone Tel	ZoneTel			

In the event a requested IXC is not part of the current TRS COC platform, AT&T provides equal access through the Industry Standard COC Application Process. AT&T also provides follow-up to ensure the IXC has made the proper connections at the LEC access tandems in order to join the TRS COC platform in a timely manner.

(4) TRS facilities. (i) TRS shall operate every day, 24 hours a day. Relay services that are not mandated by this Commission need not be provided every day, 24 hours a day, except VRS.

(ii) TRS shall have redundancy features functionally equivalent to the equipment in normal central offices, including uninterruptible power for emergency use.

(5) Technology. No regulation set forth in this subpart is intended to discourage or impair the development of improved technology that fosters the availability of telecommunications to person with disabilities. TRS facilities are permitted to use SS7 technology or any other type of similar technology to enhance the functional equivalency and quality of TRS. TRS facilities that utilize SS7 technology shall be subject to the Calling Party Telephone Number rules set forth at 47 CFR 64.1600 et seq.

(6) Caller ID. When a TRS facility is able to transmit any calling party identifying information to the public network, the TRS facility must pass through, to the called party, at least one of the following: the number of the TRS facility, 711, or the 10-digit number of the calling party.

TRS Facilities, §64.604 B.4

The FCC and the Commonwealth of Pennsylvania mandate twenty-four-hour-a-day, seven-day-a-week, 365 days a year statewide access of TRS with no limitations or restrictions that are not applicable to voice users of the telephone network. AT&T Relay Services complies with this requirement, with a 24/7/365 relay center located in New Castle, PA.

Relay providers are required to ensure an uninterruptible power source (UPS) and adequate network facilities to maintain the required P.01 grade of service. AT&T Relay Centers are equipped with an on-site generator capable of supplying all of the electrical needs for the Relay center in the unlikely event that the existing power source becomes inoperable. The center's generator is exercised regularly to ensure functionality and the fuel source is measured monthly. There is sufficient fuel stored on-site to provide in excess of 24 hours of continuous operation of the generator before refueling is necessary.

During those instances that electrical power is lost to a relay center, all of the critical equipment including the switch, back-office equipment, modems, operator positions, HVAC, lights and security equipment is automatically switched from commercial electrical power to UPS supplied power. AT&T Relay centers are equipped with sufficient UPS units to provide electricity until the generator reaches full output capacity, generally less than one (1) minute.

A Disaster Recovery Plan is in place for each location directing responses to all potential natural and man-made causes of system failures. Disaster preparedness is of highest concern for AT&T, and AT&T is widely recognized for their ability to provide emergency operators and uninterruptible power. As a result, we have been able to sustain fully adequate service levels during blizzards, flooding and other acts of nature, as well as a significant power outage that impacted the Eastern US in August 2003. Other relay providers have contracted with AT&T to act as their service and disaster recovery back up system. The Disaster Recovery Plan is reviewed by AT&T Technical, Center and network staff on regular basis. AT&T reviews the plan and escalation process every six months to ensure that all potential interruptions of service are addressed. The plan also includes employee protection and maintenance of external links of communication as well as internal operations.

In the event a power outage or disaster occurs, traffic is routed to a different relay center as available. In the event that traffic must be rerouted, AT&T has implemented the AT&T Resource Manager (ARMTM), an Intelligent Call Routing System. ARMTM is a software-based processing application offering call-by-call routing to geographically distributed call centers. This system utilizes real-time call handling and relay operator status data in routing every call.

ARMTM has a 7-day, 24-hour support center that automatically detects a failure and takes the necessary steps to rectify the situation. In addition to the automatic call distribution designed into ARMTM to circumvent an isolated call center, AT&T has deployed a fully redundant ARMTM in a second location to ensure that if a disaster were to render the primary ARMTM inoperable the backup ARMTM would continue to manage the call flow and route Pennsylvania Relay to any of the inter-connected, geographically dispersed AT&T Relay Centers without interruption.

Enhanced Technology, §64.604 B.5

Call Forwarding became available to Pennsylvania residents in 2004. TTY users, who subscribe to Call Forwarding services from their local telephone company, can utilize and activate this feature through AT&T Relay Service.

In March 2005, the Commonwealth of Pennsylvania became one of the earliest states to enroll in the FCC's Telecommunications Service Priority (TSP) Program. The FCC initially established the TSP Program in 1988 to establish a priority of restoration of telephone service to critical facilities and agencies, at a time when telecommunications repair companies are typically overburdened with service requests. The program presently restores telephone services most critical to national and homeland security on a priority basis in the event of a national crisis. Recently, the FCC has partnered with the Department of Homeland Security to increase TSP participation. With the program successfully implemented, Pennsylvania Relay users are able to make and receive calls in emergencies, just like standard telephone users in the same calling areas.

Per FCC mandate, AT&T Relay has incorporated the latest technology and support equivalent to all standard phone services. These services include Automated Number Identification (ANI), true Caller ID, call forwarding, speed dialing and other service enhancements which increase the functional equivalency of the Relay Service for all calls, both carried on the provider's network or sent out to inter-exchange (IXC) networks.

AT&T Relay Service currently provides true caller ID to all users, via AT&T's relay architecture. As required, the relay platform can pass to the called party the caller's id, provided they have not elected to block their number. The Commonwealth of Pennsylvania is fully compliant with this requirement.

C. Functional Standards:

(c) Functional standards—(1) Consumer complaint logs.(i) States and interstate providers must maintain a log of consumer complaints including all complaints about TRS in the state, whether filed with the TRS provider or the State, and must retain the log until the next application for certification is granted. The log shall include, at a minimum, the date the complaint was filed, the nature of the complaint, the date of resolution, and an explanation of the resolution.

(ii) Beginning July 1, 2002, states and TRS providers shall submit summaries of logs indicating the number of complaints received for the 12-month period ending May 31 to the Commission by July 1 of each year. Summaries of logs submitted to the Commission on July 1, 2001 shall indicate the number of complaints received from the date of OMB approval through May 31, 2001.

(2) Contact persons. Beginning on June 30, 2000, State TRS Programs, interstate TRS providers, and TRS providers that have state contracts must submit to the Commission a contact person and/or office for TRS consumer information and complaints about a certified State TRS Program's provision of intrastate TRS, or, as appropriate, about the TRS provider's service. This submission must include, at a minimum, the following:

(i) The name and address of the office that receives complaints, grievances, inquiries, and suggestions;

(ii) Voice and TTY telephone numbers, fax number, e-mail address, and web address; and

(iii) The physical address to which correspondence should be sent.

Consumer Complaint Log, §64.604 C.1

Pennsylvania Relay Service is fully compliant with all FCC regulations in the area.

AT&T Relay Service maintains an annual log of consumer complaints, inquiries, and commendations concerning Pennsylvania Relay. All feedback from the consumers of Pennsylvania Relay is recorded in AT&T's automated Commendation, Inquiry, Complaint System, more commonly referred to as CICS. All comments are entered into the CICS database within twenty-four hours of receipt. AT&T then sends an electronic copy of each entry to the appropriate Relay Center Manager for handling. The majority of CICS complaints received by AT&T are responded to and resolved by the AT&T National Customer Care Team. For complaints received directly by the Public Utilities Commission or its staff, the representative immediately shares the information with AT&T Relay Services for follow-up and resolution.

Copies of all CICS entries are maintained by AT&T Relay Services. Monthly report summaries are provided to the Commonwealth. AT&T Relay Staff immediately investigates any complaints, attempting immediate resolution whenever possible. In the event of more complex investigations (ex. a billing issue) that cannot be resolved quickly, status communication is provided to the customer. All CICS entries and monthly reports are retained by AT&T for a minimum of five years. AT&T Relay Services also prepares the annual consumer complaint summary log required by the FCC, itemizing complaints alleging violations of FCC mandatory minimum standards.

Contact Persons for State TRS Information, §64.604 C.2

All complaints, grievances, inquiries, suggestions and commendations for Pennsylvania Relay should be addressed to the Public Utilities Commission at the following address:

Dave Lewis
Pennsylvania Bureau of Consumer Services
PO Box 3265, Harrisburg, PA 17105-3265
Toll free Telephone number: 800-782-1110; Fax 717-783-5659; TTY 888-749-8870
E-mail: davlewis@state.pa.us
Website <http://www.puc.paonline.com>

The Commonwealth's PUC website also provides the forms and process for filing complaints. An additional resource is provided by the Manager of the Bureau of Consumer Services, Lou Sauers, who can be contacted at lsauers@state.pa.us. Additional inquiries or complaints about TRS can be filed with the PUC at 800-782-1110 (V); 888-749-8870 (TTY).

(3) Public access to information. Carriers, through publication in their directories, periodic billing inserts, placement of TRS instructions in telephone directories, through directory assistance services, and incorporation of TTY numbers in telephone directories, shall assure that callers in their service areas are aware of the availability and use of all forms of TRS. Efforts to educate the public about TRS should extend to all segments of the public, including individuals who are hard of hearing, speech disabled, and senior citizens as well as members of the general population. In addition, each common carrier providing telephone voice transmission services shall conduct, not later than October 1, 2001, ongoing education and outreach programs that publicize the availability of 711 access to TRS in a manner reasonably designed to reach the largest number of consumers possible.

Public Access to TRS Information, §64.604 C.3

The Commonwealth of Pennsylvania requests that phone companies publish public information on the Pennsylvania Relay service in telephone directories. The directory information page also includes reference to 7-1-1 relay access and the confidentiality of calls. Additionally, Pennsylvania Relay has conducted a statewide outreach campaign to ensure residents are aware of relay service and how to access relay.

(4) Rates. TRS users shall pay rates no greater than the rates paid for functionally equivalent voice communication services with respect to such factors as the duration of the call, the time of day, and the distance from the point of origination to the point of termination.

Rates for TRS, §64.604 C.4

Pennsylvania TRS users do not pay for local relay calls. Users pay rates equivalent to the rates charged on functionally equivalent voice communication telephone calls. The current tariff with AT&T provides an economical \$0.07 per minute rate for relay calls, unless an alternate carrier or calling plan is selected.

(5) Jurisdictional separation of costs—(i) General. Where appropriate, costs of providing TRS shall be separated in accordance with the jurisdictional separation procedures and standards set forth in the Commission's regulations adopted pursuant to section 410 of the Communications Act of 1934, as amended.

Jurisdictional Separation of Costs & Method of Funding, §64.604 C.5

AT&T Relay Services follows all State and FCC guidelines for reimbursement of relay calls and separation of jurisdictional costs. Costs for interstate relay call minutes are reimbursed to AT&T by the National Exchange Carrier Association, Incorporated (NECA) in accordance with the Interstate Cost Recover Plan effective July 26, 1993. More recently, relay calls placed over the internet (IP and VRS relay calls) and terminating in Pennsylvania are also reimbursed to authorize relay providers through the NECA Interstate TRS Fund.

(ii) Cost recovery. Costs caused by interstate TRS shall be recovered from all subscribers for every interstate service, utilizing a shared-funding cost recovery mechanism. Except as noted in this paragraph, with respect to VRS, costs caused by intrastate TRS shall be recovered from the intrastate jurisdiction. In a state that has a certified program under §64.605, the state agency providing TRS shall, through the state's regulatory agency, permit a common carrier to recover costs incurred in providing TRS by a method consistent with the requirements of this section. Costs caused by the provision of interstate and intrastate VRS shall be recovered from all subscribers for every interstate service, utilizing a shared-funding cost recovery mechanism.

(iii) Telecommunications Relay Services Fund. Effective July 26, 1993, an Interstate Cost Recovery Plan, hereinafter referred to as the TRS Fund, shall be administered by an entity selected by the Commission (administrator). The initial administrator, for an interim period, will be the National Exchange Carrier Association, Inc.

(A) Contributions. Every carrier providing interstate telecommunications services shall contribute to the TRS Fund on the basis of interstate end-user telecommunications revenues as described herein. Contributions shall be made by all carriers who provide interstate services, including, but not limited to, cellular telephone and paging, mobile radio, operator services, personal communications service (PCS), access (including subscriber line charges), alternative access and special access, packet-switched, WATS, 800, 900, message telephone service (MTS), private line, telex, telegraph, video, satellite, intraLATA, international and resale services.

(B) Contribution computations. Contributors' contribution to the TRS fund shall be the product of their subject revenues for the prior calendar year and a contribution factor determined annually by the Commission. The contribution factor shall be based on the ratio between expected TRS Fund expenses to interstate end-user telecommunications revenues. In the event that contributions exceed TRS payments and administrative costs, the contribution factor for the following year will be adjusted by an appropriate amount, taking into consideration projected cost and usage changes. In the event that contributions are inadequate, the fund administrator may request authority from the Commission to borrow funds commercially, with such debt secured by future years' contributions. Each subject carrier must contribute at least \$25 per year. Carriers whose annual contributions total less than \$1,200 must pay the entire contribution at the beginning of the contribution period. Service providers whose contributions total \$1,200 or more may divide their contributions into equal monthly payments. Carriers shall complete and submit, and contributions shall be based on, a "Telecommunications Reporting Worksheet" (as published by the

Commission in the Federal Register). The worksheet shall be certified to by an officer of the contributor, and subject to verification by the Commission or the administrator at the discretion of the Commission. Contributors' statements in the worksheet shall be subject to the provisions of section 220 of the Communications Act of 1934, as amended. The fund administrator may bill contributors a separate assessment for reasonable administrative expenses and interest resulting from improper filing or overdue contributions. The Chief of the Consumer & Governmental Affairs Bureau may waive, reduce, modify or eliminate contributor reporting requirements that prove unnecessary and require additional reporting requirements that the Bureau deems necessary to the sound and efficient administration of the TRS Fund.

(C) Data collection from TRS Providers. TRS providers shall provide the administrator with true and adequate data necessary to determine TRS fund revenue requirements and payments. TRS providers shall provide the administrator with the following: total TRS minutes of use, total interstate TRS minutes of use, total TRS operating expenses and total TRS investment in general accordance with part 32 of the Communications Act, and other historical or projected information reasonably requested by the administrator for purposes of computing payments and revenue requirements. The administrator and the Commission shall have the authority to examine, verify and audit data received from TRS providers as necessary to assure the accuracy and integrity of fund payments.

(D) [Reserved]

(E) Payments to TRS providers. TRS Fund payments shall be distributed to TRS providers based on formulas approved or modified by the Commission. The administrator shall file schedules of payment formulas with the Commission. Such formulas shall be designed to compensate TRS providers for reasonable costs of providing interstate TRS, and shall be subject to Commission approval. Such formulas shall be based on total monthly interstate TRS minutes of use. TRS minutes of use for purposes of interstate cost recovery under the TRS Fund are defined as the minutes of use for completed interstate TRS calls placed through the TRS center beginning after call set-up and concluding after the last message call unit. In addition to the data required under paragraph (c)(5)(iii)(C) of this section, all TRS providers, including providers who are not interexchange carriers, local exchange carriers, or certified state relay providers, must submit reports of interstate TRS minutes of use to the administrator in order to receive payments. The administrator shall establish procedures to verify payment claims, and may suspend or delay payments to a TRS provider if the TRS provider fails to provide adequate verification of payment upon reasonable request, or if directed by the Commission to do so. The TRS Fund administrator shall make payments only to eligible TRS providers operating pursuant to the mandatory minimum standards as required in §64.604, and after disbursements to the administrator for reasonable expenses incurred by it in connection with TRS Fund administration. TRS providers receiving payments shall file a form prescribed by the administrator. The administrator shall fashion a form that is consistent with parts 32 and 36 procedures reasonably tailored to meet the needs of TRS providers. The Commission shall have authority to audit providers and have access to all data, including carrier specific data, collected by the fund administrator. The fund administrator shall have authority to audit TRS providers reporting data to the administrator. The formulas should appropriately compensate interstate providers for the provision of VRS, whether intrastate or interstate.

(F) TRS providers eligible for receiving payments from the TRS Fund are:

- (1) TRS facilities operated under contract with and/or by certified state TRS programs pursuant to §64.605; or
- (2) TRS facilities owned by or operated under contract with a common carrier providing interstate services operated pursuant to §64.604; or
- (3) Interstate common carriers offering TRS pursuant to §64.604; or
- (4) Video Relay Service (VRS) and Internet Protocol (IP) Relay providers certified by the Commission pursuant to §64.605.

(G) Any eligible TRS provider as defined in paragraph (c)(5)(iii)(F) of this section shall notify the administrator of its intent to participate in the TRS Fund thirty (30) days prior to submitting reports of TRS interstate minutes of use in order to receive payment settlements for interstate TRS, and failure to file may exclude the TRS provider from eligibility for the year.

(H) Administrator reporting, monitoring, and filing requirements. The administrator shall perform all filing and reporting functions required in paragraphs (c)(5)(iii)(A) through (c)(5)(iii)(J) of this section. TRS

payment formulas and revenue requirements shall be filed with the Commission on May 1 of each year, to be effective the following July 1. The administrator shall report annually to the Commission an itemization of monthly administrative costs which shall consist of all expenses, receipts, and payments associated with the administration of the TRS Fund. The administrator is required to keep the TRS Fund separate from all other funds administered by the administrator, shall file a cost allocation manual (CAM) and shall provide the Commission full access to all data collected pursuant to the administration of the TRS Fund. The administrator shall account for the financial transactions of the TRS Fund in accordance with generally accepted accounting principles for federal agencies and maintain the accounts of the TRS Fund in accordance with the United States Government Standard General Ledger. When the administrator, or any independent auditor hired by the administrator, conducts audits of providers of services under the TRS program or contributors to the TRS Fund, such audits shall be conducted in accordance with generally accepted government auditing standards. In administering the TRS Fund, the administrator shall also comply with all relevant and applicable federal financial management and reporting statutes. The administrator shall establish a non-paid voluntary advisory committee of persons from the hearing and speech disability community, TRS users (voice and text telephone), interstate service providers, state representatives, and TRS providers, which will meet at reasonable intervals (at least semi-annually) in order to monitor TRS cost recovery matters. Each group shall select its own representative to the committee. The administrator's annual report shall include a discussion of the advisory committee deliberations.

(I) Information filed with the administrator. The administrator shall keep all data obtained from contributors and TRS providers confidential and shall not disclose such data in company-specific form unless directed to do so by the Commission. Subject to any restrictions imposed by the Chief of the Consumer & Governmental Affairs Bureau, the TRS Fund administrator may share data obtained from carriers with the administrators of the universal support mechanisms (See 47 CFR 54.701 of this chapter), the North American Numbering Plan administration cost recovery (See 47 CFR 52.16 of this chapter), and the long-term local number portability cost recovery (See 47 CFR 52.32 of this chapter). The TRS Fund administrator shall keep confidential all data obtained from other administrators. The administrator shall not use such data except for purposes of administering the TRS Fund, calculating the regulatory fees of interstate common carriers, and aggregating such fee payments for submission to the Commission. The Commission shall have access to all data reported to the administrator, and authority to audit TRS providers. Contributors may make requests for Commission nondisclosure of company-specific revenue information under §0.459 of this chapter by so indicating on the Telecommunications Reporting Worksheet at the time that the subject data are submitted. The Commission shall make all decisions regarding nondisclosure of company-specific information.

(J) The administrator's performance and this plan shall be reviewed by the Commission after two years.

(K) All parties providing services or contributions or receiving payments under this section are subject to the enforcement provisions specified in the Communications Act, the Americans with Disabilities Act, and the Commission's rules.

(6) Complaints—(i) Referral of complaint. If a complaint to the Commission alleges a violation of this subpart with respect to intrastate TRS within a state and certification of the program of such state under §64.605 is in effect, the Commission shall refer such complaint to such state expeditiously.

(ii) Intrastate complaints shall be resolved by the state within 180 days after the complaint is first filed with a state entity, regardless of whether it is filed with the state relay administrator, a state PUC, the relay provider, or with any other state entity.

(iii) Jurisdiction of Commission. After referring a complaint to a state entity under paragraph (c)(6)(i) of this section, or if a complaint is filed directly with a state entity, the Commission shall exercise jurisdiction over such complaint only if:

(A) Final action under such state program has not been taken within:

(1) 180 days after the complaint is filed with such state entity; or

(2) A shorter period as prescribed by the regulations of such state; or

(B) The Commission determines that such state program is no longer qualified for certification under §64.605.

(iv) The Commission shall resolve within 180 days after the complaint is filed with the Commission any interstate TRS complaint alleging a violation of section 225 of the Act or any complaint involving intrastate relay services in states without a certified program. The Commission shall resolve intrastate complaints over which it exercises jurisdiction under paragraph (c)(6)(iii) of this section within 180 days.

(v) Complaint procedures. Complaints against TRS providers for alleged violations of this subpart may be either informal or formal.

(A) Informal complaints—(1) Form. An informal complaint may be transmitted to the Consumer & Governmental Affairs Bureau by any reasonable means, such as letter, facsimile transmission, telephone (voice/TRS/TTY), Internet e-mail, or some other method that would best accommodate a complainant's hearing or speech disability.

(2) Content. An informal complaint shall include the name and address of the complainant; the name and address of the TRS provider against whom the complaint is made; a statement of facts supporting the complainant's allegation that the TRS provided it has violated or is violating section 225 of the Act and/or requirements under the Commission's rules; the specific relief or satisfaction sought by the complainant; and the complainant's preferred format or method of response to the complaint by the Commission and the defendant TRS provider (such as letter, facsimile transmission, telephone (voice/TRS/TTY), Internet e-mail, or some other method that would best accommodate the complainant's hearing or speech disability).

(3) Service; designation of agents. The Commission shall promptly forward any complaint meeting the requirements of this subsection to the TRS provider named in the complaint. Such TRS provider shall be called upon to satisfy or answer the complaint within the time specified by the Commission. Every TRS provider shall file with the Commission a statement designating an agent or agents whose principal responsibility will be to receive all complaints, inquiries, orders, decisions, and notices and other pronouncements forwarded by the Commission. Such designation shall include a name or department designation, business address, telephone number (voice and TTY), facsimile number and, if available, internet e-mail address.

(B) Review and disposition of informal complaints. (1) Where it appears from the TRS provider's answer, or from other communications with the parties, that an informal complaint has been satisfied, the Commission may, in its discretion, consider the matter closed without response to the complainant or defendant. In all other cases, the Commission shall inform the parties of its review and disposition of a complaint filed under this subpart. Where practicable, this information shall be transmitted to the complainant and defendant in the manner requested by the complainant (e.g., letter, facsimile transmission, telephone (voice/TRS/TTY) or Internet e-mail).

(2) A complainant unsatisfied with the defendant's response to the informal complaint and the staff's decision to terminate action on the informal complaint may file a formal complaint with the Commission pursuant to paragraph (c)(6)(v)(C) of this section.

(C) Formal complaints. A formal complaint shall be in writing, addressed to the Federal Communications Commission, Enforcement Bureau, Telecommunications Consumer Division, Washington, DC 20554 and shall contain:

(1) The name and address of the complainant,

(2) The name and address of the defendant against whom the complaint is made,

(3) A complete statement of the facts, including supporting data, where available, showing that such defendant did or omitted to do anything in contravention of this subpart, and

(4) The relief sought.

(D) Amended complaints. An amended complaint setting forth transactions, occurrences or events which have happened since the filing of the original complaint and which relate to the original cause of action may be filed with the Commission.

(E) Number of copies. An original and two copies of all pleadings shall be filed.

(F) Service. (1) Except where a complaint is referred to a state pursuant to §64.604(c)(6)(i), or where a complaint is filed directly with a state entity, the Commission will serve on the named party a copy of any complaint or amended complaint filed with it, together with a notice of the filing of the complaint. Such notice shall call upon the defendant to satisfy or answer the complaint in writing within the time specified in said notice of complaint.

(2) All subsequent pleadings and briefs shall be served by the filing party on all other parties to the proceeding in accordance with the requirements of §1.47 of this chapter. Proof of such service shall also be made in accordance with the requirements of said section.

(G) Answers to complaints and amended complaints. Any party upon whom a copy of a complaint or amended complaint is served under this subpart shall serve an answer within the time specified by the Commission in its notice of complaint. The answer shall advise the parties and the Commission fully and completely of the nature of the defense and shall respond specifically to all material allegations of the complaint. In cases involving allegations of harm, the answer shall indicate what action has been taken or is proposed to be taken to stop the occurrence of such harm. Collateral or immaterial issues shall be avoided in answers and every effort should be made to narrow the issues. Matters alleged as affirmative defenses shall be separately stated and numbered. Any defendant failing to file and serve an answer within the time and in the manner prescribed may be deemed in default.

(H) Replies to answers or amended answers. Within 10 days after service of an answer or an amended answer, a complainant may file and serve a reply which shall be responsive to matters contained in such answer or amended answer and shall not contain new matter. Failure to reply will not be deemed an admission of any allegation contained in such answer or amended answer.

(I) Defective pleadings. Any pleading filed in a complaint proceeding that is not in substantial conformity with the requirements of the applicable rules in this subpart may be dismissed.

Receipt of Complaints, §64.604 C.6

Pennsylvania Relay consumers can provide comments directly to AT&T or to the Commonwealth in a number of ways.

AT&T receives consumer comments from:

- Communication Assistants (CA)
- Relay Center Support Desk
- AT&T Relay Service Customer Care Desk 1-866-682-8706 (V) /1800-682-8786 (TTY)
- AT&T National Relay Website: www.att.com/relay
- Consumer Correspondence
- Pennsylvania Relay Advisory Council Members
- Contracted Outreach Staff
- Consumer Correspondence

The Commonwealth of Pennsylvania and AT&T Relay Services are committed to ensuring relay users are satisfied with the service provided, and work closely together to quickly address any issues involving relay service.

Over the past five years, the average turnaround time for resolution of complaints has been 24 hours or less, with the majority of complaints being resolved on the same day. All complaints directly related to CA performance are routed to the relay center manager, who is required to meet with the individual CA within seventy-two hours of receipt of the complaint. Additional CA training is then scheduled if appropriate. Complaints or inquiries related to technical or billing issues are not subject to a specific deadline since technical research or follow-up with other entities may be necessary. However, timely resolution of these items is still required and monitored by the Commonwealth of Pennsylvania.

If a complaint takes longer than 30 days to resolve and/or appears to address a violation of FCC standards, appropriate PSC representatives contact AT&T for additional information. If required, the consumer is also contacted for additional information, or a status is provided to both the consumer and the Commonwealth's representatives. Ongoing communication on status and resolution of the complaint continues, but rarely if ever continues to this point. The consumer is also informed about the federal informal and formal complaint processes with the FCC.

Pennsylvania Relay Service is in full compliance with FCC requirements regarding consumer complaint processes.

(7) Treatment of TRS customer information. Beginning on July 21, 2000, all future contracts between the TRS administrator and the TRS vendor shall provide for the transfer of TRS customer profile data from the outgoing TRS vendor to the incoming TRS vendor. Such data must be disclosed in usable form at least 60 days prior to the provider's last day of service provision. Such data may not be used for any purpose other than to connect the TRS user with the called parties desired by that TRS user. Such information shall not be sold, distributed, shared or revealed in any other way by the relay center or its employees, unless compelled to do so by lawful order.

Relay Choice Profiles & Portability of TRS Customer Information, §64.604 C.7

Pennsylvania and AT&T use Relay Choice Profiles (RCPs) to store customer information, and RCPs are available to all Pennsylvania Relay users. RCPs can be used to identify in-coming call types, designate preferred toll providers (both regional and long distance), indicate call preferences (inclusion of background noise and spelling correction), and store up to twenty frequently called numbers. RCPs can be set-up by mailing an RCP form to AT&T, on-line at <http://www.att.com/relay> or the AT&T Relay National Customer Care Center via fax at 1-888-288-2184. Customers can also create/update their RCP over the phone with the AT&T Relay Service National Customer Care Center representatives.

Pennsylvania Relay also offers relay users a type of RCP called a Multi-User Relay Choice Profile (MURCP). The new MURCP allows a customer to access his/her profile from any location, not just their home or office number. It also allows multiple relay users in the same household to have their own private profile choices. The customer must request their MURCP be set up through the AT&T Relay Services National Customer Care Desk, or via the AT&T Relay Website. Once a customer has set up a MURCP, he/she will have a private 4-digit PIN that must be provided to the CA in order to activate the profile for each relay session. For confidentiality purposes, the CA will not have access to a PIN if the MURCP user does not provide it at the time of the call. It will be the caller's responsibility to retain the PIN.

All RCP information is strictly confidential and requires only the relay caller's phone number or PIN for identification. No customer information is sold or otherwise revealed in any manner. However, in compliance with FCC requirements, all customer information contained in an RCP is transferable to an incoming TRS vendor within the stated timeframe of 60 days.

A copy of the on-line RCP form is provided as an attachment.

§64.605 STATE CERTIFICATION.

(a) State documentation—(1) Certified state program. Any state, through its office of the governor or other delegated executive office empowered to provide TRS, desiring to establish a state program under this section shall submit, not later than October 1, 1992, documentation to the Commission addressed to the Federal Communications Commission, Chief, Consumer & Governmental Affairs Bureau, TRS Certification Program, Washington, DC 20554, and captioned "TRS State Certification Application." All documentation shall be submitted in narrative form, shall clearly describe the state program for implementing intrastate TRS, and the procedures and remedies for enforcing any requirements imposed by the state program. The Commission shall give public notice of states filing for certification including notification in the Federal Register.

The Commonwealth of Pennsylvania has complied with all requirements in this area. The narrative submitted contains thorough documentation of how Pennsylvania Relay Service is in full compliance with all federal mandates for the Relay Service.

(2) VRS and IP Relay provider. Any entity desiring to provide VRS or IP Relay services, independent from any certified state TRS program or any TRS provider otherwise eligible for compensation from the Interstate TRS Fund, and to receive compensation from the Interstate TRS Fund, shall submit documentation to the Commission addressed to the Federal Communications Commission, Chief, Consumer & Governmental Affairs Bureau, TRS Certification Program, Washington, DC 20554, and captioned "VRS and IP Relay Certification Application." The documentation shall include, in narrative form:

(i) A description of the forms of TRS to be provided (i.e., VRS and/or IP Relay);

(ii) A description of how the provider will meet all non-waived mandatory minimum standards applicable to each form of TRS offered;

(iii) A description of the provider's procedures for ensuring compliance with all applicable TRS rules;

(iv) A description of the provider's complaint procedures;

(v) A narrative describing any areas in which the provider's service will differ from the applicable mandatory minimum standards;

(vi) A narrative establishing that services that differ from the mandatory minimum standards do not violate applicable mandatory minimum standards;

(vii) Demonstration of status as a common carrier; and

(viii) A statement that the provider will file annual compliance reports demonstrating continued compliance with these rules.

(b) (1) Requirements for state certification. After review of state documentation, the Commission shall certify, by letter, or order, the state program if the Commission determines that the state certification documentation:

(i) Establishes that the state program meets or exceeds all operational, technical, and functional minimum standards contained in §64.604;

(ii) Establishes that the state program makes available adequate procedures and remedies for enforcing the requirements of the state program, including that it makes available to TRS users informational materials on state and Commission complaint procedures sufficient for users to know the proper procedures for filing complaints; and

(iii) Where a state program exceeds the mandatory minimum standards contained in §64.604, the state establishes that its program in no way conflicts with federal law.

(2) Requirements for VRS and IP Relay Provider FCC Certification. After review of certification documentation, the Commission shall certify, by Public Notice, that the VRS or IP Relay provider is eligible for compensation from the Interstate TRS Fund if the Commission determines that the certification documentation:

(i) Establishes that the provision of VRS and/or IP Relay will meet or exceed all non-waived operational, technical, and functional minimum standards contained in §64.604;

(ii) Establishes that the VRS and/or IP Relay provider makes available adequate procedures and remedies for ensuring compliance with the requirements of this section and the mandatory minimum standards contained in §64.604, including that it makes available for TRS users informational materials on complaint procedures sufficient for users to know the proper procedures for filing complaints; and

(iii) Where the TRS service differs from the mandatory minimum standards contained in §64.604, the VRS and/or IP Relay provider establishes that its service does not violate applicable mandatory minimum standards.

(c)(1) State certification period. State certification shall remain in effect for five years. One year prior to expiration of certification, a state may apply for renewal of its certification by filing documentation as prescribed by paragraphs (a) and (b) of this section.

(2) VRS and IP Relay Provider FCC certification period. Certification granted under this section shall remain in effect for five years. A VRS or IP Relay provider may apply for renewal of its certification by filing documentation with the Commission, at least 90 days prior to expiration of certification, containing the information described in paragraph (a)(2) of this section.

(d) Method of funding. Except as provided in §64.604, the Commission shall not refuse to certify a state program based solely on the method such state will implement for funding intrastate TRS, but funding mechanisms, if labeled, shall be labeled in a manner that promote national understanding of TRS and do not offend the public.

(e)(1) Suspension or revocation of state certification. The Commission may suspend or revoke such certification if, after notice and opportunity for hearing, the Commission determines that such certification is no longer warranted. In a state whose program has been suspended or revoked, the Commission shall take such steps as may be necessary, consistent with this subpart, to ensure continuity of TRS. The

Commission may, on its own motion, require a certified state program to submit documentation demonstrating ongoing compliance with the Commission's minimum standards if, for example, the Commission receives evidence that a state program may not be in compliance with the minimum standards.

(2) Suspension or revocation of VRS and IP Relay Provider FCC certification. The Commission may suspend or revoke the certification of a VRS or IP Relay provider if, after notice and opportunity for hearing, the Commission determines that such certification is no longer warranted. The Commission may, on its own motion, require a certified VRS or IP Relay provider to submit documentation demonstrating ongoing compliance with the Commission's minimum standards if, for example, the Commission receives evidence that a certified VRS or IP Relay provider may not be in compliance with the minimum standards.

(f) Notification of substantive change. (1) States must notify the Commission of substantive changes in their TRS programs within 60 days of when they occur, and must certify that the state TRS program continues to meet federal minimum standards after implementing the substantive change.

(2) VRS and IP Relay providers certified under this section must notify the Commission of substantive changes in their TRS programs, services, and features within 60 days of when such changes occur, and must certify that the interstate TRS provider continues to meet federal minimum standards after implementing the substantive change.

(g) VRS and IP Relay providers certified under this section shall file with the Commission, on an annual basis, a report providing evidence that they are in compliance with §64.604.

Appendix

No. 6.2

Provision of TRS

FCC Order Ref. 90- 571	FCC Requirement	AT&T RELAY SERVICES
Provision of Services		
d 64.603	Each common carrier providing telephone voice transmission services shall provide, not later than July 26, 1993, in compliance with the regulations prescribed therein, throughout the area in which it offers services, telecommunications relay services, individually, through designees, through a competitively selected vendor, or in concert with other carriers.	<i>AT&T Relay Services was the first organization to provide 24/7/365 relay services. AT&T recently celebrated 20 years of serving the Deaf/HOH community.</i>
	Speech-to-speech relay service shall be provided by March 1, 2001.	<i>AT&T is fully compliant with the FCC requirement of offering Speech-TO-Speech Relay Service. This is a standard offering via Pennsylvania Relay Services.</i>
	Interstate Spanish language relay service shall be provided by March 1, 2001.	<i>AT&T is fully compliant with the FCC requirement of offering Spanish language relay services.</i>
	In addition, not later than October 1, 2001, access via the 711 dialing code to all relay services as a toll free call.	<i>AT&T is fully compliant with 711 access to all of its Relay Services. Pennsylvania customers dial 711 and their calls are routed to our call-handling centers for processing.</i>
Operational Standards		
d 64.604 A.(1).I	Communications Assistant (CA) Competency Skills	

CAs are to be sufficiently trained to effectively meet the specialized communications needs of individuals with hearing and speech disabilities.	<i>AT&T Relay exceeds this FCC standard by requiring that training of Relay CAs includes special call type processing, cross cultural training, and on-going training.</i>
--	--

d 64.604 A.(1).ii	CAs must have competent skills in typing, grammar, spelling, and interpretation of typewritten ASL, familiarity with hearing and speech disability cultures, languages, and etiquette.	<i>All CAs are tested and evaluated to ensure Relay skills meet FCC Guidelines. CA training provides familiarity with hearing, deaf, and Speech-Disabled cultures, with relay etiquette and with ASL translation. All AT&T Relay CAs are tested for grammar and spelling competency prior to being employed by AT&T Relay Services.</i>
d 64.604 A.(1).iii	Typing Speed - 60 WPM with technological aids	<i>Each AT&T Relay CA is required to take an annual typing test and qualify at minimum of 60 wpm without technological aids.</i>
	Oral-to-type tests	<i>All AT&T Relay CAs are tested annually on dictation-type tests where they must type from spoken conversation. Test verbiage is consistently new material that CAs have not had previous exposure to.</i>
d 64.604 A.(1).iv	VRS 'qualified' Interpreters	<i>AT&T Relay Services does not currently provide Video Relay Services for the State of PA.</i>
d 64.604 A.(1).v	In-call Replacement of CAs	

CAs answering and placing a TTY-based TRS or VRS call must stay with the call for a minimum of 10 minutes.	<i>AT&T Relay meets the FCC requirement. Change of CAs during a call is discouraged. A CA must stay on a STS call for a minimum of 15 minutes or on a non-STS call for a minimum of ten minutes. If a change is necessary, both parties shall be informed. If a change of CAs is requested by the TTY or standard phone user without explanation, it shall be done without question. Both parties are informed of a change in CA by the words "relief CA XXX (M/F)".</i>
STS CAs – 15 minutes.	<i>All AT&T Relay CAs stay on a STS call for a minimum of 15 minutes as required.</i>

d64.604.A.(1).vi	CA Gender Preferences	<p>TRS providers must make best efforts to accommodate a TRS user's requested CA gender when a call is initiated and, if a transfer occurs, at the time the call is transferred to another CA.</p> <p><i>At the onset of a relay call, a CA's gender and ID number is given to the caller. In the event that a call is transferred, the new CA will also provide their ID and gender. Upon request of the Relay user, the CA will transfer the call to the requested gender.</i></p>
d64.604.A.(1).vii	<p>Conversations transmitted in real time</p> <p>TRS shall transmit conversations between TTY and voice callers in real time.</p>	<p><i>AT&T Relay Services transmits conversations in real time as required by the FCC.</i></p>
d64.604.(2).i	<p>Confidentiality & Conversation Context</p> <p>CAs are prohibited from disclosing the content of any relayed conversation regardless of content</p>	<p><i>AT&T Relay has written confidentiality policies in place and copies are provided to users upon request. CAs are reviewed on the Code of Ethics and the Pledge of Confidentiality on a regular basis. AT&T Relay CAs are trained and evaluated to ensure all aspects of confidentiality are maintained and conversational context is properly provided.</i></p> <p><i>AT&T Relay CAs are prohibited from disclosing any call content.</i></p>

		<i>If a user is in an emergency or life-threatening situation or causes an emergency situation to exist by threatening the CA or the Relay Center, names and specific information may be disclosed by the CA to a supervisor to expeditiously address the situation. In the case of threats against the Relay center, CAs, Supervisors, or Other Personnel, such information may be disclosed to appropriate law enforcement agencies.</i>
	Certain exceptions are provided for Speech-to-Speech calls.	<i>When processing PA Relay calls, STS CAs are permitted to retain info from a call in order to facilitate the completion of consecutive subsequent calls.</i>
d 64.604 A.2.ii	CAs are prohibited from intentionally altering a relayed conversation and must relay all conversation verbatim unless specifically requested to do otherwise	<i>PA Relay CAs are trained to type all conversation heard (including background sounds) and to read verbatim what is typed by the TTY user. If a caller requests ASL translation as a default, the CA will then translate the typed segment of the call to conversational English.</i>
Types of Calls		
d 64.604 A.3.i	CAs are prohibited from refusing single or sequential calls or limiting the length of calls utilizing relay services.	<i>AT&T Relay does not place any limits on sequential calls or the length of calls.</i>
d 64.604 A.3.ii	TRS shall be capable of handling any type of call normally provided by common carriers.	<i>AT&T Relay services is capable of handling any type of call normally provided by common carriers. PA Relay is fully compliant with this FCC standard.</i>

d 64.604 A.3.iii	Relay service providers are permitted to decline a call because credit authorization is denied.	<i>AT&T Relay attempts to attain alternate billing information from callers. AT&T Relay declines calls when necessary due to credit being denied.</i>
d 64.604 A.3.iv	Relay services shall be capable of handling pay-per-call calls.	<i>AT&T Relay Services processes pay-per calls in an equivalent fashion to how they would be processed for hearing individuals.</i>
Types of Calls		
d 64.604 A.3.v	TRS providers are required to provide the following types of TRS Calls: (1) text-to-voice and voice-to-text (2) VCO, two-line VCO, VCO-TTY, VCO-VCO, (3) HCO, two-line HCO, HCO-TTY, HCO-to HCO.	<i>AT&T Relay Services processes the following call types for PA Relay callers: Text to Voice, Voice to Text, Voice to Voice, Text to VCO, VCO to Text, VCO to HCO, VCO with Privacy, Hearing to Hearing, HCO to VCO, Text to HCO, HCO with Privacy, HCO to Text, Two Line VCO, Speech-to-Speech, Spanish-to-Spanish, VCO-to-VCO, HCO-to-HCO, Two line HCO, Pay-Per-Calls (900).</i>
d 64.604 A.3.vi	TRS Providers are required to provide call release, speed-dialing, and three way calling functionality.	<i>AT&T Relay Services is fully-compliant with Call release regulations. AT&T Relay Services "releases" TTY-TTY calls after they are connected. Per-minute reimbursement ceases after a call is released from the CA position.</i>
	TRS Providers are required to provide speed-dialing.	<i>AT&T Relay Services encourages Relay Users to set up profiles containing their frequently called numbers. These numbers will be speed-dialed upon a customer's request</i>

	TRIS Providers are required to provide three-way calling functionality.	<i>AT&T Relay Services processes three-way calls for our customers. Customers utilize their "flash" button to join on two lines and the Relay CA then relays the three-way call.</i>
d 64.604 A.3.vii	Voice mail & Interactive Menus	
	CAs must alert the TRIS user to the presence of a recorded message & interactive menu thru a hot key on the CA's terminal.	<i>AT&T Relay accepts upfront instructions from the caller which might include a note that they are dialing to a recorded message or interactive menu. Customers may provide upfront instructions on how to proceed with the call and which options to select. If no upfront instructions are given, the CA will dial to the recording, inform the caller a recording has been reached, and relay the complete recorded message.</i>
	TRIS providers shall electronically capture recorded messages & retain them for the length of the call, & may not impose any charges for additional calls that must be made by the user in order to complete calls involving recorded or interactive messages.	<i>AT&T Relay Oprs have electronic means to capture automated menus and type them verbatim to the caller. AT&T has methods in place to ensure that no additional charges are made for subsequent calls that need to be placed to complete calls terminating with a recorded message or interactive menu.</i>
	Answering Machine/ Voice Mail Message Retrieval	
d 64.604 A.3.viii	TRIS Providers shall provide, as TRIS features, answering machine and voice mail retrieval.	Answering machine message retrieval or voice mailbox retrieval as a standard offering to our PA Relay customers.

Handling of Emergency Calls		
d 64.604 A.4	At a minimum, TRS Providers must be able to pass emergency callers to the appropriate PSAP.	<i>AT&T Relay Services processes emergency calls in compliance with FCC regulations. Emergency calls are connected to the appropriate PSAPs.</i>
d 64.604 A.5	Relay Providers must offer STS callers an option of maintaining a list of numbers at the relay center.	<i>AT&T Relay Services offers STS callers the opportunity to set up a profile of speed-dialed numbers. When requested, an Operator will retrieve a number for the list, state the name and telephone number, and dial the number as requested.</i>
	This information must be transferred to any new provider.	<i>When required, AT&T Relay will provide STS user information to any new provider.</i>
Technical Standards		
d 64.604 A.5B (1)	ASCII & Baudot TRS shall be capable of communicating with ASCII & Baudot format at any speed generally in use.	<i>As required, AT&T Relay's terminals, keyboards, and modems are compatible with TTY devices in service and are capable of receiving and accessing TTY calls at any Baud rate generally in use.</i>
d 64.604 A.5B (2).I	Speed of Answer TRS shall include adequate staffing to ensure 85% of all calls answered within 10 seconds by any method which results in the caller's call immediately being placed, not put in a queue or on hold.	<i>PA Relay contract requires that 85% of all calls be answered in 10 seconds or less. By forecasting call volumes and staffing appropriately, AT&T Relay Services exceeds this requirement on a regular basis. An answer performance metric of 93%-99% of all calls answered in less than 10 seconds from the period of 2003-July 2007.</i>

Abandoned calls shall be included in the speed-of-answer calculation.	<i>As required, AT&T Relay Services includes abandoned calls in their speed-of-answer calculation.</i>
Speed of Answer is to be measured on a daily basis.	<i>Speed of Answer is monitored on a constant basis and overall results are reported to the state as required.</i>
The system shall be designed to a P.01 standard.	<i>AT&T Relay Services platform is engineered for a P.01 grade of service, wherein blockage rate will be measured by sampling the number of calls being blocked for each 24 hour period. Reports of less than 1 in 100, the functional equivalent for the blockage rate for voice users, indicate Pennsylvania Relay's full compliance with the FCC requirement for a P.01 standard.</i>
d 64.604 B.3	Equal Access to IXCs <i>Pennsylvania relay customers can select from a wide variety of carriers currently connected to the Relay platform. The Carrier-of-Choice platform for PA relay customers hosts over 40 IXC's. Processes are in place to add carriers to the list when requested by Pennsylvania Relay Customers.</i>
d 64.604 B.4	TRS Facilities

TRS shall operate everyday, 24 hours a day.

TRS shall have redundancy features functionally equivalent to the equipment in normal central offices, including uninterruptible power for emergency use. Adequate network facilities shall be used in conjunction with TRS.

AT&T Relay provides 24 hour service every day of the year that is backed up with redundancy of equipment and an uninterruptible power source in the center. Customers do not receive a busy signal due to loop trunk congestion.

AT&T Relay services exceeds the FCC requirement for network facilities.

d 64.604 B.5	Technology	<p>No regulation set forth in this subpart is intended to discourage or impair the development of improved technology that fosters the availability of telecomm to people with disabilities.</p> <p><i>AT&T Relay services exceed the FCC regulations for technology requirements. AT&T utilizes the newest switch technology to provide more functionally equivalent features for relay users. These include: - Functionally equivalent Caller ID – with the new switching technology required; a call block on the originating line can be detected and passed to the terminating call; Delivery of originating call information to a PSAP as described in Operator standards; Multiple customer profiles for multi-user households and for use away from the home NPA-NXX-XXXX.</i></p>
d 64.604 B.6	Caller ID	<p>Caller ID. When a TRS facility is able to transmit any calling party identifying information to the public network, the TRS facility must pass through, to the called party, at least one of the following: the number of the TRS facility, 711, or the 10-digit number of the calling party.</p> <p><i>AT&T Relay Service's current architecture allows for the transmission of true caller ID. AT&T Relay Service's platform enables full compliance with all FCC rules regarding Caller ID and call blocking services</i></p>
Functional Standards		
d 64.604 C.1	Consumer Complaint Logs	

States must maintain a log of complaints including all complaints about TRS to include minimum include the date the complaint was filed, the nature of the complaint, the date of resolution and an explanation of the resolution.	<i>AT&T Relay maintains logs of all complaints. Logs include all pertinent information including the date of the complaint, the nature of the complaint, and the explanation and date of resolution.</i>
States & TRS providers shall submit to the FCC by July 1 of each year, summaries of logs indicating the number of complaints received for the 12-month period ending May 31.	<i>Annual FCC reports are prepared and submitted by July 1st of each calendar year.</i>

d 64.604 C.2	Contact Persons	States must submit to the FCC a contact person or office for TRS consumer information and complaints about intrastate TRS.	<i>Required information has been submitted by the State of Pennsylvania and AT&T Relay Services and is currently posted on the FCC website.</i>
d 64.604 C.3	Public Access to Info	Carriers, through publication in their directories, periodic billing inserts, placement of TRS instructions, in phone directories, DA services, & incorporation of TTY numbers in phone directories, shall assure that callers are aware of all forms of TRS.	<i>Pennsylvania exceeds this requirement. Pennsylvania oversees an extensive outreach and advertising campaign for Relay services. . Relay Service phone number listings are in phone books as well as other advertisements that target the Relay user-base.</i>
		Conduct ongoing education and outreach programs to publicize availability of 711 access.	<i>AT&T Relay employees as well as PA State employees regularly participate in outreach events and promote education of 711 dialing and other relay access and usage information.</i>
d 64.604 C.4	Rates		

TRS users shall pay rates no greater than the rates paid for functionally equivalent voice communication services with respect to such factors as the duration of the call, the time of day, and the distance from the point of origination to the point of ter

Pennsylvania Relay users pay rates that are equivalent to the rates paid for functionally equivalent voice communication services. AT&T Relay Service's technology allows the system to detect the TRS user's local calling area and place calls that terminate within that area at no extra cost to the user. If the terminating number is outside the user's calling area he/she can use the Carrier of Choice to bill the call. Relay users are billed according to their selected calling plan.

d 64.604
C.5

Jurisdictional Separation of Costs

(i) General, where appropriate, costs of providing TRS shall be separated in accordance with the jurisdictional separation procedures and standards set for in the Commission's regulations

AT&T Relay Services follows FCC requirements in the jurisdictional separation of costs.

	(ii) Cost recovery, Costs caused by interstate TRS shall be recovered from all subscribers for every interstate service, utilizing a shared-funding cost recovery mechanism	<i>Interstate TRS costs are recovered from all subscribers for every interstate service utilizing the shared-funding cost recovery mechanism.</i>
	(iii) Telecommunications Relay Services Fund – To be administered by the National Exchange Carrier Association, Inc. (NECA)	<i>Interstate Relay Calls are reimbursed by the NECA fund.</i>
d 64.604 C.6	Complaints	<p><i>The State of Pennsylvania along with AT&T Relay Services have a comprehensive Customer Contact process that is fully compliant with all FCC Requirements.</i></p> <p>(i) Referral of complaint,</p> <p>(ii) Intrastate complaint resolution,</p> <p>(iii) Jurisdiction of Commission,</p> <p>(iv) Interstate complaint resolution,</p> <p>(v) Complaint Procedures</p>
d 64.604 C.7	Treatment of TRS Customer Info	

Future contacts between the TRS administrator and the TRS vendor shall provide for the transfer of TRS customer profile data from the outgoing TRS vendor to the incoming TRS vendor. Such data must be disclosed in usable form at least 60 days prior to the provider's last day of service, and shall not be sold, distributed, shared or revealed in any other way by the relay provider or its employees unless compelled to do so by lawful order.

AT&T Relay Services is aware and will comply with the stipulation that incumbent Relay Providers, upon loss of the contract, will transfer all customer information to the new vendor. AT&T Relay is fully aware of this requirement will provide information to a new relay provider when necessary. AT&T Relay does not use Relay Customer information for any purpose other than conducting relay business.

d 64.605

State Certification

Per FCC's Public Notice on TRS State Re-certification released 5/1/02, the FCC requests an application be submitted through State's Office of the Governor or other delegated executive office empowered to provide TRS.

AT&T Relay Services assists the states we provide Relay Services for with in preparation of re-certification documentation.

Appendix

No. 6.3

ATT CA Training and Confidentiality

COMMUNICATIONS ASSISTANT TRAINING



AT&T Relay Services - Initial Training Outline

Here is an overview of the key topics covered in initial relay service training.

Module 1 – Introduction to the Relay Service

- Explanation of the Relay Service
- Identifying customers who use the Relay Service
- Explanation of how the Relay Service works
- The role of the Relay Operator
- The customers expectations for Relay Service
- Comparison of a relay call to a call with an Operator
- Availability of Relay Services
- Confidentiality and Code of Ethics – Rules for relaying calls
- Other Relay Operator requirements – FCC regulations

Module 2 – Introduction to TTY

- Background on the TTY
- The parts of a TTY
- Connecting a TTY to the Telephone System
- Explanation of how a TTY works
- How to use a TTY to place a call
- Other communication devices

Module 3 - Introduction to the Work Station and Call Conditions

- The kind of equipment used by a Relay Operator
- Information available to the Relay operator about the customer
- How to prepare billing records for relay calls
- Steps for processing Basic Relay Calls
- TTY to Voice & Voice to TTY
- In Call Replacement
- Relay Operator Relief Procedures
- Gender Request
- Relay Choice Profile (RCP)
- Personal Memory Dial (PMD)

Module 4 - ASL Translation / Interpretation

- ASL Translation/Interpretation as the Default
- ASL Grammar Rules
- Understanding ASL Translation/Interpretation
- Explanation of ASL Gloss
- Operator proficiency requirement in ASL / PSE Translation/Interpretation
- Procedures for obtaining Relief
- Identifying Translation/Interpretation preferences in the customers Relay Choice Profile

Module 5 - Introduction to Voice Carry-Over (VCO) Calls

- Explanation of Voice Carry-Over calls
- Procedures for processing VCO calls
- Profiled
- Not Profiled
- TTY to Voice
- Voice to TTY

Module 6 - Introduction to Basic Relay Calls

- Recorded Messages – Play Back Device (PBD)
- Procedures for placing calls to beepers/pagers
- Procedures for completing calls to toll free numbers such as 800, 866, 888, & 877
- Procedures for completing calls to directory assistance

Module 7 - CSIDS Module

- Description of common CSIDS keys
- CSIDS Quick Reference
- Emergency
- Domestic "General" rate quote
- Domestic "Computed" rate quote
- International "General" rate quote
- International "Computed" rate quote
- Collect/Calling Card billing to International Countries
- Canada
- Frequently asked questions & key actions
- Keyword Help

Module 7 - Emergency Calls

- What is considered an emergency call
- Steps for securing an emergency agency listing
- Emergency call handling procedures

Module 8 - Alternate Billing

- Steps for handling alternate billing requests
- Collect
- Third number
- Detariffing Order
- Person to Person
- Calling Cards
- Commercial Credit Cards
- Prepaid Calling Cards
- Procedures for handling calls from a Coin phone
- Special Treatment Window

Module 9 - Carrier of Choice (COC)

Identifying COC calls

COC specified in the customers Relay Choice Profile (RCP)

COC requested during call set-up

Customer indicates using a participating carrier's calling card

List of participating Carriers of Choice

Procedures for non participating carrier of choice requests

Steps for completing billing of COC requests

Module 10- Introduction to Special Call Handling and Call Types

711 Dialing

Spanish Voice and TTY transfers

900 Pay Per Call

Processing 900 number requests

Processing 900 Pay Per Call requests when terminating to a recorded message

Processing 900 Pay Per Call requests when answered by a live person

Calls that cannot be completed to a requested 900 number

511 Virginia

STS Overview

Identifying a Speech-to-Speech (STS) customer

Procedures for processing STS calls

Telebraille Customers (Pacing)

Hearing Carry-Over (HCO)

Explanation of HCO calls

Comparison of HCO calls to VCO calls

Procedures for processing HCO Calls

Specialty Call Types
Two-Line VCO or Voice Translation
Reverse Two-Line VOC or Voice Translation
Two-Line HCO or Hearing Translation
Voice to Voice (VTV)
Voice to TTY (VTT)
VCO Privacy
HCO Privacy
Hearing to Hearing (HTH)
VCO to HCO (VTH)
Touch-Tone Carry-Over (TCO)
3-Way Calling
Revised SLAM procedures
SLAM procedures
International Calls
Calls Terminating to another Relay Center
One Minute Hold Guidelines
Customer Contact Process (Request for Supervisor or Customer Care Desk)
Internet Relay

Module 11 -DNIS Switched Calls

Procedures for TTY to TTY calls
Relay to OSD
Relay to OSD to Relay
OSD to Relay

Module 12 -Introduction to OSD

Explanation of Operator Services for the Deaf (OSD)
Comparison of OSD to Relay Service
Type of calls that are permitted through OSD and availability

FCC Order Ref. 90-571	FCC Requirement	AT&T RELAY SERVICES
Provision of Services		
d 64.603	Each common carrier providing telephone voice transmission services shall provide, not later than July 26, 1993, in compliance with the regulations prescribed therein, throughout the area in which it offers services, telecommunications relay services, individually, through designees, through a competitively selected vendor, or in concert with other carriers.	<i>AT&T Relay Services was the first organization to provide 24/7/365 relay services. AT&T recently celebrated 20 years of serving the Deaf/HOH community.</i>
	Speech-to-speech relay service shall be provided by March 1, 2001.	<i>AT&T is fully compliant with the FCC requirement of offering Speech-To-Speech Relay Service. This is a standard offering via Pennsylvania Relay Services.</i>
	Interstate Spanish language relay service shall be provided by March 1, 2001.	<i>AT&T is fully compliant with the FCC requirement of offering Spanish language relay services.</i>
	In addition, not later than October 1, 2001, access via the 711 dialing code to all relay services as a toll free call.	<i>AT&T is fully compliant with 711 access to all of its Relay Services. Pennsylvania customers dial 711 and their calls are routed to our call-handling centers for processing.</i>
Operational Standards		
d 64.604 A.(1).I	Communications Assistant (CA) Competency Skills	
	CAs are to be sufficiently trained to effectively meet the specialized communications needs of individuals with hearing and speech disabilities.	<i>AT&T Relay exceeds this FCC standard by requiring that training of Relay CAs includes special call type processing, cross cultural training, and on-going training.</i>

d 64.604 A.(1).ii	CAs must have competent skills in typing, grammar, spelling, and interpretation of typewritten ASL, familiarity with hearing and speech disability cultures, languages, and etiquette.	<i>All CAs are tested and evaluated to ensure Relay skills meet FCC Guidelines. CA training provides familiarity with hearing, deaf, and Speech-Disabled cultures, with relay etiquette and with ASL translation. All AT&T Relay CAs are tested for grammar and spelling competency prior to being employed by AT&T Relay Services.</i>
d 64.604 A.(1).iii	Typing Speed - 60 WPM with technological aids	<i>Each AT&T Relay CA is required to take an annual typing test and qualify at minimum of 60 wpm without technological aids.</i>
	Oral-to-type tests	<i>All AT&T Relay CAs are tested annually on dictation-type tests where they must type from spoken conversation. Test verbiage is consistently new material that CAs have not had previous exposure to.</i>
d 64.604 A.(1).iv	VRS 'qualified' Interpreters	<i>AT&T Relay Services does not currently provide Video Relay Services for the State of PA.</i>
d 64.604 A.(1).v	In-call Replacement of CAs	
	CAs answering and placing a TTY-based TRS or VRS call must stay with the call for a minimum of 10 minutes.	<i>AT&T Relay meets the FCC requirement. Change of CAs during a call is discouraged. A CA must stay on a STS call for a minimum of 15 minutes or on a non-STS call for a minimum of ten minutes. If a change is necessary, both parties shall be informed. If a change of CAs is requested by the TTY or standard phone user without explanation, it shall be done without question. Both parties are informed of a change in CA by the words " relief CA XXX (M/F)".</i>
	STS CAs – 15 minutes.	<i>All AT&T Relay CAs stay on a STS call for a minimum of 15 minutes as required.</i>
d64.604.A.(1).vi	CA Gender Preferences	

TRS providers must make best efforts to accommodate a TRS user's requested CA gender when a call is initiated and, if a transfer occurs, at the time the call is transferred to another CA.

At the onset of a relay call, a CA's gender and ID number is given to the caller. In the event that a call is transferred, the new CA will also provide their ID and gender. Upon request of the Relay user, the CA will transfer the call to the requested gender.

Conversations transmitted in real time

d64.604.A.(1).vii TRS shall transmit conversations between TTY and voice callers in real time.

AT&T Relay Services transmits conversations in real time as required by the FCC.

Confidentiality & Conversation Context

d64.604.(2).I

CAs are prohibited from disclosing the content of any relayed conversation regardless of content

AT&T Relay has written confidentiality policies in place and copies are provided to users upon request. CAs are reviewed on the Code of Ethics and the Pledge of Confidentiality on a regular basis. AT&T Relay CAs are trained and evaluated to ensure all aspects of confidentiality are maintained and conversational context is properly provided.

AT&T Relay CAs are prohibited from disclosing any call content. If a user is in an emergency or life-threatening situation or causes an emergency situation to exist by threatening the CA or the Relay Center, names and specific information may be disclosed by the CA to a supervisor to expeditiously address the situation. In the case of threats against the Relay center, CAs, Supervisors, or Other Personnel, such information may be disclosed to appropriate law enforcement agencies.

Certain exceptions are provided for Speech-to-Speech calls.

When processing PA Relay calls, STS CAs are permitted to retain info from a call in order to facilitate the completion of consecutive subsequent calls.

d 64.604 A.2.ii

CAs are prohibited from intentionally altering a relayed conversation and must relay all conversation verbatim unless specifically requested to do otherwise

PA Relay CAs are trained to type all conversation heard (including background sounds) and to read verbatim what is typed by the TTY user. If a caller requests ASL translation as a default, the CA will then translate the typed segment of the call to conversational English.

Types of Calls

d 64.604 A.3.i

CAs are prohibited from refusing single or sequential calls or limiting the length of calls utilizing relay services.

AT&T Relay does not place any limits on sequential calls or the length of calls.

d 64.604 A.3.ii

TRS shall be capable of handling any type of call normally provided by common carriers.

AT&T Relay services is capable of handling any type of call normally provided by common carriers. PA Relay is fully compliant with this FCC standard.

d 64.604 A.3.iii

Relay service providers are permitted to decline a call because credit authorization is denied.

AT&T Relay attempts to attain alternate billing information from callers. AT&T Relay declines calls when necessary due to credit being denied.

d 64.604 A.3.iv

Relay services shall be capable of handling pay-per-call calls.

AT&T Relay Services processes pay-per calls in an equivalent fashion to how they would be processed for hearing individuals.

Types of Calls

d 64.604 A.3.v

TRS providers are required to provide the following types of TRS Calls: (1) text-to-voice and voice-to-text (2) VCO, two-line VCO, VCO-TTY, VCO-VCO, (3) HCO, two-line HCO, HCO-TTY, HCO-to HCO.

*AT&T Relay Services processes the following call types for PA Relay callers:
 Text to Voice, Voice to Text, Voice to Voice, Text to VCO,
 VCO to Text, VCO to HCO, VCO with Privacy, Hearing to Hearing,
 HCO to VCO, Text to HCO, HCO with Privacy, HCO to Text,
 Two Line VCO, Speech-to-Speech, Spanish-to-Spanish, VCO-to-VCO,
 HCO-to-HCO, Two line HCO, Pay-Per-Calls (900).*

d 64.604 A.3.vi

TRS Providers are required to provide call release, speed-dialing, and three way calling functionality.

AT&T Relay Services is fully compliant with Call release regulations. AT&T Relay Services "releases" TTY-TTY calls after they are connected. Per-minute reimbursement ceases after a call is released from the CA position.

TRS Providers are required to provide speed-dialing.

AT&T Relay Services encourages Relay Users to set up profiles containing their frequently called numbers. These numbers will be speed-dialed upon a customer's request

TRS Providers are required to provide three-way calling functionality.

AT&T Relay Services processes three-way calls for our customers. Customers utilize their "flash" button to join on two lines and the Relay CA then relays the three-way call.

d 64.604 A.3.vii

VoiceMail & Interactive Menus

CAs must alert the TRS user to the presence of a recorded message & interactive menu thru a hot key on the CA's terminal.

AT&T Relay accepts upfront instructions from the caller which might include a note that they are dialing to a recorded message or interactive menu. Customers may provide upfront instructions on how to proceed with the call and which options to select. If no upfront instructions are given, the CA will dial to the recording, inform the caller a recording has been reached, and relay the complete recorded message.

TRS providers shall electronically capture recorded messages & retain them for the length of the call, & may not impose any charges for additional calls that must be made by the user in order to complete calls involving recorded or interactive messages.

AT&T Relay Oprs have electronic means to capture automated menus and type them verbatim to the caller. AT&T has methods in place to ensure that no additional charges are made for subsequent calls that need to be placed to complete calls terminating with a recorded message or interactive menu.

Answering Machine/ Voice Mail Message Retrieval

d 64.604 A.3.viii	TRS Providers shall provide, as TRS features, answering machine and voice mail retrieval.	Answering machine message retrieval or voice mailbox retrieval as a standard offering to our PA Relay customers.
Handling of Emergency Calls		
d 64.604 A.4	At a minimum, TRS Providers must be able to pass emergency callers to the appropriate PSAP.	<i>AT&T Relay Services processes emergency calls in compliance with FCC regulations. Emergency calls are connected to the appropriate PSAPs.</i>
d 64.604 A.5	Relay Providers must offer STS callers an option of maintaining a list of numbers at the relay center.	AT&T Relay Services offers STS callers the opportunity to set up a profile of speed-dialed numbers. When requested, an Operator will retrieve a number for the list, state the name and telephone number, and dial the number as requested.
	This information must be transferred to any new provider.	<i>When required, AT&T Relay will provide STS user information to any new provider.</i>
Technical Standards		
d 64.604 A.5B (1)	TRS shall be capable of communicating with ASCII & Baudot format at any speed generally in use.	ASCII & Baudot <i>As required, AT&T Relay's terminals, keyboards, and modems are compatible with TTY devices in service and are capable of receiving and accessing TTY calls at any Baud rate generally in use.</i>
d 64.604 A.5B (2).i	TRS shall include adequate staffing to ensure 85% of all calls answered within 10 seconds by any method which results in the caller's call immediately being placed, not put in a queue or on hold.	Speed of Answer <i>PA Relay contract requires that 85% of all calls be answered in 10 seconds or less. By forecasting call volumes and staffing appropriately, AT&T Relay Services exceeds this requirement on a regular basis. An answer performance metric of 93%-99% of all calls answered in less than 10 seconds from the period of 2003-July 2007.</i>
	Abandoned calls shall be included in the speed-of-answer calculation.	<i>As required, AT&T Relay Services includes abandoned calls in their speed-of-answer calculation.</i>

<p>Speed of Answer is to be measured on a daily basis.</p>	<p><i>Speed of Answer is monitored on a constant basis and overall results are reported to the state as required.</i></p>
<p>The system shall be designed to a P.01 standard.</p>	<p><i>AT&T Relay Services platform is engineered for a P.01 grade of service, wherein blockage rate will be measured by sampling the number of calls being blocked for each 24 hour period. Reports of less than 1 in 100, the functional equivalent for the blockage rate for voice users, indicate Pennsylvania Relay's full compliance with the FCC requirement for a P.01 standard.</i></p>
<p>d 64.604 B.3</p> <p>TRS users shall have access to their chosen IXC carrier through the TRS and to all other operator services, to the same extent that such access is provided to voice users.</p>	<p>Equal Access to IXCs</p> <p><i>Pennsylvania relay customers can select from a wide variety of carriers currently connected to the Relay platform. The Carrier-of-Choice platform for PA relay customers hosts over 40 IXC's. Processes are in place to add carriers to the list when requested by Pennsylvania Relay Customers.</i></p>
<p>d 64.604 B.4</p> <p>TRS shall operate everyday, 24 hours a day.</p> <p>TRS shall have redundancy features functionally equivalent to the equipment in normal central offices, including uninterruptible power for emergency use.</p> <p>Adequate network facilities shall be used in conjunction with TRS.</p>	<p>TRS Facilities</p> <p><i>AT&T Relay provides 24 hour service every day of the year that is backed up with redundancy of equipment and an uninterruptible power source in the center. Customers do not receive a busy signal due to loop trunk congestion.</i></p> <p><i>AT&T Relay services exceeds the FCC requirement for network facilities.</i></p>
<p>d 64.604 B.5</p>	<p>Technology</p>

No regulation set forth in this subpart is intended to discourage or impair the development of improved technology that fosters the availability of telecomm to people with disabilities.

AT&T Relay services exceed the FCC regulations for technology requirements. AT&T utilizes the newest switch technology to provide more functionally equivalent features for relay users. These include: - Functionally equivalent Caller ID – with the new switching technology required; a call block on the originating line can be detected and passed to the terminating call; Delivery of originating call information to a PSAP as described in Operator standards; Multiple customer profiles for multi-user households and for use away from the home NPA-NXX-XXXX.

Caller ID

d 64.604 B.6

Caller ID. When a TRS facility is able to transmit any calling party identifying information to the public network, the TRS facility must pass through, to the called party, at least one of the following: the number of the TRS facility, 711, or the 10-digit number of the calling party.

AT&T Relay Service's current architecture allows for the transmission of true caller ID. AT&T Relay Service's platform enables full compliance with all FCC rules regarding Caller ID and call blocking services

Functional Standards

d 64.604 C.1

Consumer Complaint Logs

States must maintain a log of complaints including all complaints about TRS to include minimum include the date the complaint was filed, the nature of the complaint, the date of resolution and an explanation of the resolution.

AT&T Relay maintains logs of all complaints. Logs include all pertinent information including the date of the complaint, the nature of the complaint, and the explanation and date of resolution.

States & TRS providers shall submit to the FCC by July 1 of each year, summaries of logs indicating the number of complaints received for the 12-month period ending May 31.

Annual FCC reports are prepared and submitted by July 1st of each calendar year.

d 64.604 C.2

Contact Persons

States must submit to the FCC a contact person or office for TRS consumer information and complaints about intrastate TRS.

Required information has been submitted by the State of Pennsylvania and AT&T Relay Services and is currently posted on the FCC website.

d 64.604 C.3

Public Access to Info

Carriers, through publication in their directories, periodic billing inserts, placement of TRS instructions, in phone directories, DA services, & incorporation of TTY numbers in phone directories, shall assure that callers are aware of all forms of TRS.

Pennsylvania exceeds this requirement. Pennsylvania oversees an extensive outreach and advertising campaign for Relay services. . Relay Service phone number listings are in phone books as well as other advertisements that target the Relay user-base.

Conduct ongoing education and outreach programs to publicize availability of 711 access.

AT&T Relay employees as well as PA State employees regularly participate in outreach events and promote education of 711 dialing and other relay access and usage information.

d 64.604 C.4

Rates

TRS users shall pay rates no greater than the rates paid for functionally equivalent voice communication services with respect to such factors as the duration of the call, the time of day, and the distance from the point of origination to the point of ter

Pennsylvania Relay users pay rates that are equivalent to the rates paid for functionally equivalent voice communication services. AT&T Relay Service's technology allows the system to detect the TRS user's local calling area and place calls that terminate within that area at no extra cost to the user. If the terminating number is outside the user's calling area he/she can use the Carrier of Choice to bill the call. Relay users are billed according to their selected calling plan.

d 64.604 C.5

Jurisdictional Separation of Costs

(i) General, where appropriate, costs of providing TRS shall be separated in accordance with the jurisdictional separation procedures and standards set for in the Commission's regulations

AT&T Relay Services follows FCC requirements in the jurisdictional separation of costs.

(ii) Cost recovery, Costs caused by interstate TRS shall be recovered from all subscribers for every interstate service, utilizing a shared-funding cost recovery mechanism

Interstate TRS costs are recovered from all subscribers for every interstate service utilizing the shared-funding cost recovery mechanism.

(iii) Telecommunications Relay Services Fund – To be administered by the National Exchange Carrier Association, Inc. (NECA)

Interstate Relay Calls are reimbursed by the NECA fund.

d 64.604 C.6

Complaints

(i) Referral of complaint,

The State of Pennsylvania along with AT&T Relay Services have a comprehensive Customer Contact process that is fully compliant with all FCC Requirements.

(ii) Intrastate complaint resolution,

(iii) Jurisdiction of Commission,

(iv) Interstate complaint resolution,

(v) Complaint Procedures

d 64.604 C.7

Treatment of TRS Customer Info

Future contacts between the TRS administrator and the TRS vendor shall provide for the transfer of TRS customer profile data from the outgoing TRS vendor to the incoming TRS vendor. Such data must be disclosed in usable form at least 60 days prior to the provider's last day of service, and shall not be sold, distributed, shared or revealed in any other way by the relay provider or its employees unless compelled to do so by lawful order.

AT&T Relay Services is aware and will comply with the stipulation that incumbent Relay Providers, upon loss of the contract, will transfer all customer information to the new vendor. AT&T Relay is fully aware of this requirement will provide information to a new relay provider when necessary. AT&T Relay does not use Relay Customer information for any purpose other than conducting relay business.

d 64.605

State Certification

Per FCC's Public Notice on TRS State Re-certification released 5/1/02, the FCC requests an application be submitted through State's Office of the Governor or other delegated executive office empowered to provide TRS.

AT&T Relay Services assists the states we provide Relay Services for with in preparation of re-certification documentation.

Appendix

No. 6.4

ATT Choice Profile



AT&T Relay Service – Relay Choice Profile

Please complete the entire form.

Step 1

1. Please check which applies to you:

☐ New RCP ☐ Update RCP ☐ Remove RCP

2. Standard Profile – Please provide your telephone number-**area code first**

3. Multi-User Profile – Pick this option if there is more than one relay user in your household. Please pick four-digit PIN number to have your multi-user profile set up

4. If you would be willing to provide your email address so that you could be emailed information on AT&T's Relay Services, please enter it below. These messages would not be frequent and your email address would not be used for any other purpose.

5. Please provide a **password** for identification (password may be 4 to 8 characters long and can be numbers, letters or a combination of both).

Step 2

6. Please select your preferred **long-distance telephone service carrier**. (*By not making a selection, you are choosing AT&T as your long-distance carrier for relay.*) If your long distance carrier isn't listed, they have chosen not to participate in the TRS Carrier of Choice program. By making this selection, you are not changing your current long-distance carrier for calls made from your home telephone, which do not use relay service. (See page 4 for a list of carriers)

7. Please select your **regional telephone service carrier**. Remember that regional service is the telephone service outside your local calling area, but not long distance. (*By not making a selection you are choosing AT&T as your regional telephone service carrier for relay services.*) Some telephone carriers may not be available in all areas. By making this selection, you are not changing your current regional carrier for calls made from your home telephone, which do not use relay service.



Relay Choice Profile, continued

8. Every time I call relay, or receive a relay call, I prefer to use: (choose one)

PC/ASCII No	<input type="checkbox"/> Yes <input type="checkbox"/>	TTY/VCO No	<input type="checkbox"/> Yes <input type="checkbox"/>
PC/ASCII/2LVCO No	<input type="checkbox"/> Yes <input type="checkbox"/>	TTY/2LVCO No	<input type="checkbox"/> Yes <input type="checkbox"/>
STS No	<input type="checkbox"/> Yes <input type="checkbox"/>	TTY/HCO No	<input type="checkbox"/> Yes <input type="checkbox"/>
TTY (Baudot/Turbocode) No	<input type="checkbox"/> Yes <input type="checkbox"/>	VOICE No	<input type="checkbox"/> Yes <input type="checkbox"/>

9. Every time I use relay, I would like my calls to have the following features:

Language Type: (select one)

- Verbatim: CA to verbalized typed msg word for word ☐ Yes ☐ No
- Typed ASL to English and English to typed ASL ☐ Yes ☐ No
- Spanish to Spanish ☐ Yes ☐ No

- CA to identify background noise ☐ Yes ☐ No
- Spelling Check ☐ Yes ☐ No
- Explain Relay on each call ☐ Yes ☐ No
- CA to type slowly ☐ Yes ☐ No

10. Dial Out Restrictions: Please select the following types of calls that **you do not want made** from your telephone number:

- ☐ 900 ☐ 976 ☐ Other: ☐ International

11. Caller ID: Please select how you would like your telephone number to appear on Caller ID units when you place calls: ☐ Block My Number ☐ Send My Number ☐ Send Relay Number

12. If you would like to add special instructions such as: prefer male or female CA, personal announcement phrase to announce your relay call, or to retrieve your voice mail, please type them in the box below. You will be contacted by an AT&T Relay Staff member to discuss your special instructions.

Please keep in mind that special instructions provided is not guaranteed for each relay call contingent on the relay-calling situation. The AT&T Relay staff will do their best to accommodate your special instructions.

**Step 3**

13. **Speed Dialing:** Please list the names and telephone numbers that you call frequently that become your **personal memory dial list**. You can tell the CA, "call dad", and they will dial the number. (You may store up to 20 names)

Name (40 letters or less)	Phone Number Please include area code)
1.	
2.	
3.	
4.	
5.	
6.	
7.	
8.	
9.	
10.	
11.	
12.	
13.	
14.	
15.	
16.	
17.	
18.	
19.	
20.	

THANKS! Your Relay Choice Profile should be activated within 48 hours!

You can MAIL this form to: **AT&T Relay Services – Customer Service**
100 S. Jefferson Street, Suite 115
New Castle, PA 16101

You can FAX this form to: **1-888-288-2184**

You can CALL AT&T Relay Services with questions about this form at:

1-800-682-8786 (TTY)
1-800-682-8706 (VOICE)

You can enter via the WEB at **www.att.com/relay**



Relay Choice Profile - Additional information:

Password

All the information you enter into the Relay Choice Profile will be kept confidential unless required by law. No one but you can access it. This password must be between four and eight characters long. It can be numbers, letters or a combination of both. With this password, only you can change or update your profile.

Personal Memory Dial List / Speed Dialing

With this convenient memory dial list, you can store up to 20 frequently dialed telephone numbers in the Relay Choice database. When you place the call to anyone on that list, you only tell the Communications Assistant whom to call. With memory dial, you can store frequently dialed numbers and even request that the CA dial them by name.

Voice Carry Over (VCO)

This profile is great for TTY and VCO phone users who want to speak for themselves. To make a call, VCO users should first type the number they want to call (VCO will already be turned on). When the CA comes online, the VCO user can speak. The CA then types the standard telephone user's response back. Best of all, when VCO users receive the call, they'll be able to answer the phone by speaking naturally because this feature will be automatically connected.

Hearing Carry Over (HCO)

This allows TTY users who can hear to listen to the other person on the phone directly. The CA then voices the TTY user's typed response back to the voice caller.

Communications Preference

A time-saving benefit that enables you to be automatically connected in the mode in which you called. In other words, if you always use your TTY (baudot) you will be connected as TTY (baudot). Other connection preferences include: PC (ACSII), PC (ASCII)/2LVCO, STS, TTY/VCO, TTY/2LVCO, TTY/HCO, Voice, Phone.

Carrier Preference

This feature lets you specify which long-distance and regional telephone carriers you are using for relay services, such as AT&T. By entering the carrier of choice in your profile, you can save time up front and avoid billing confusion later. **Please note, not all carriers are available for every AT&T Relay state.** Current carriers include:

AT&T	ALLNET/FRONTIER
COX (Bus)	COX (Res)
CLEAR CHOICE FIVE TALK 10-10	LDOS
MCI	METROMEDIA
QWEST	SPRINT
TELCOMM USA 10-10	VARTEC
VERIZON	WILTEL
	WORLDXCHANGE 10-10

*Spelling Correction

A great new feature for TTY and ASCII users. It automatically spell checked and corrects certain words misspelled by the CA. On your screen, you would see only the corrected word, which results in clearer conversation.

*Background Noise

This feature instructs the CA to communicate any appropriate sounds – laughter, for example – that can be deleted over the telephone in addition to the spoken words from the voice user. It provides you with additional information. Some people prefer not to be informed about background noise. As a profile feature, you will be able to turn background noise off.

CA to type slowly

Also known as **Text Pacing**. This feature is specific for vision impaired (e.g. Deaf/Blind) and elderlys who want the CA to type slowly for ease of reading the text message.

Language Type

This tells the CA which type of language you prefer when using AT&T Relay. (Choose only one.)

**Does not apply to STS users*

Appendix

No. 6.5

ATT Tariff

R-00072520

FCC Docket No. CG 03-123
Application for Recertification of the Pennsylvania TRS
November 9, 2007
Page 217

Supplement No. 2 to
Pa. P.U.C. Number 24

AT&T COMMUNICATIONS OF PENNSYLVANIA, LLC

TELECOMMUNICATIONS RELAY SERVICES

ISSUED: JULY 17, 2007

EFFECTIVE: JULY 18, 2007

By J. Michael Schweder, President
214 Senate Avenue, Suite 401
Camp Hill, PA 17011

NOTICE

RECEIVED

JUL 16 2007

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

OFFICIALLY FILED TARIFF

Page 2

Pa. P.U.C. Number 24
Canceling Pa. P.U.C. Number 9

This tariff for AT&T Communications of PA, LLC and the cancellation of
tariff Pa. P.U.C.-No. 9 for AT&T Communications of PA, Inc. is filed in
compliance with the Commission's Order in Docket Nos. A-311163, A-
311163F0002, A-311163F0003, and A-310125F2000.

OFFICIALLY FILED TARIFF

R-00072520

FCC Docket No. CG 03-123
Application for Recertification of the Pennsylvania TRS
November 9, 2007
Page 219

Supplement No. 2 to
Pa. P.U.C. Number 24
2nd Revised List of Changes
Canceling 1st Revised List of Changes

This filing updates tariff references on the following pages:

1.1 AT&T Pennsylvania Telecommunications Relay Services, 2nd Revised Sheet 2 and Sheet 5.

The following page is being moved from Pa. P.U.C. Number 22 that was recently withdrawn, and references are being updated:

1.1 AT&T Pennsylvania Telecommunications Relay Services, Original Sheet 11

TELECOMMUNICATIONS RELAY SERVICES

1.1. AT&T PENNSYLVANIA TELECOMMUNICATIONS RELAY SERVICES

1.1.1. General

AT&T Pennsylvania Telecommunications Relay Services provide the means whereby an individual with a hearing and/or speech disability utilizing a Text Telephone (TTY) may communicate over the existing telecommunications network with others through the assistance of a communications assistant. The AT&T Pennsylvania Relay Center (Relay Center) will accept calls which originate and/or terminate in the Commonwealth of Pennsylvania, or calls between two other jurisdictions which are billed to a telephone number or to a LEC or AT&T Calling Card in the Commonwealth of Pennsylvania, and which can be dialed directly by a communications assistant at the request of the originating caller.

(C)

1.1.2. Description and Method of Operation

The Relay Center will allow individuals with hearing and/or speech disabilities to communicate over the telecommunications network by performing the following functions:

A. Accept a call from an individual with a hearing and/or speech disability equipped with a TTY and place a call as specified by the originator to an individual with hearing/speech capability. The communications assistant will then verbally relay conversations transmitted over the TTY from the call originator to the individual with hearing/speech capability, and relay conversations via TTY from the individual with hearing/speech capability to the individual with a speech and/or hearing disability.

B. Accept calls from an individual with hearing/speech capability and place a call as specified by the originator to an individual with a speech and/or hearing disability equipped with a TTY. The communications assistant will then relay conversations to the individual with a speech and/or hearing disability via TTY from the originating caller, and relay conversations verbally from the individual with a speech and/or hearing disability to the hearing/speech capable party.

C. The Telecommunications Relay Center will have a Voice Carry Over (VCO) capability to allow the individual with a hearing disability to speak directly to another individual who can hear. The Telecommunications Relay Center will also have a Hearing Carry Over (HCO) capacity so the individual with a speech disability possessing hearing abilities can listen directly to the speaking individual. The communications assistant will type only the spoken response to an individual with a hearing disability, or speak the written response of the individual with the speech disability.

OFFICIALLY FILED TARIFF

TELECOMMUNICATIONS RELAY SERVICES

1.2. AT&T PENNSYLVANIA TELECOMMUNICATIONS RELAY SERVICES

1.1.2. Description and Method of Operation (Cont'd)

D. The Telecommunications Relay Center will have a Speech to Speech (STS) capability to allow a person with a speech disability to communicate on the telephone. A STS user can use his/her own voice, voice synthesizer, voice enhancer, or other assistive communication device to communicate to the called party over the telephone, speakerphone or cellular phone. STS customers can call a dedicated toll free number, (800) 229-5746 (English) or (866) 260-9470 (Spanish), and reach a specially trained communications assistant who will provide assistance in completing a STS call. The two customers (one with a speech disability and the other with normal voice) communicate directly with each other through the assistance of the communications assistant.

OFFICIALLY FILED TARIFF

AT&T COMMUNICATIONS
OF PENNSYLVANIA, LLC

Supplement No. 2 to
Pa. P.U.C.-No. 24
Section 1
2nd Revised Sheet 2
Canceling 1st Revised Sheet 2

TELECOMMUNICATIONS RELAY SERVICES

1.1. AT&T PENNSYLVANIA TELECOMMUNICATIONS RELAY SERVICES (Cont'd)

1.1.3. Text Telephone (TTY)

The Relay Center will accept or originate calls utilizing a TTY in either ASCII or Baudot code at the discretion of the individual with a hearing and/or speech disability. It is the responsibility of the individual with a hearing and/or speech disability to procure and maintain a TTY that is compatible with either of these formats.

1.1.4. Regulations

Applicable regulations for calls which originate and terminate in the Commonwealth of Pennsylvania are as outlined in PA. P.U.C. No. 27, Section 3, General Regulations. Applicable regulations for all other calls may be found in AT&T Consumer Services Guides located at www.att.com/serviceguide/home. In addition: (C)

A. The Relay Center is available to provide relay service 24 hours per day, 7 days per week.

B. AT&T shall not be liable for errors in transmitting, translating, receiving or delivering conversations by telephone, TTY, or any other instrumentality over the facilities of the Company, connecting utilities or through the Pennsylvania Relay Center.

C. The Relay Center may be accessed by individuals with hearing/speech capability using a single toll free "800" number. Individuals with hearing and/or speech disabilities can access the Relay Center using a separate single toll free "800" number. The Relay Center can also be accessed by dialing 711.

D. The Relay Center will provide sufficient capacity such that not more than an average of 2 calls within 100 call attempts will be blocked.

E. The Relay Center will provide sufficient capacity to ensure that at least an average of 85% of all incoming calls are answered by the Relay Center within 10 seconds, and no more than 30 seconds shall elapse between receipt of dialing information and the dialing of the requested number.

F. The Relay Center will complete non-coin sent paid calls including, but not limited to, third party calls, calling card calls, and collect calls. Telecommunications Relay Service (TRS) calls originating from public or semi-public phones can be completed if the customer chooses an AT&T CIID/891 Card, LEC-issued Card or Commercial Credit/Charge Card as an alternative method of payment. (C)

OFFICIALLY FILED TARIFF

TELECOMMUNICATIONS RELAY SERVICES

1.1. AT&T PENNSYLVANIA TELECOMMUNICATIONS RELAY SERVICES (Cont'd)

1.1.4. Regulations (Cont'd)

G. There is no time limit on the duration of connections made through the Relay Center. TRS shall transmit conversations between TT and voice callers in real time.

H. The Relay Center will not handle:

- calls to 556, 976, 700 or 911 numbers
- sent paid calls from coin telephones

I. Any service outage exceeding four hours in length within a twenty-four hour period will subject AT&T to a penalty equivalent to an average of one day's (24 Hours) billing in the prior calendar month for the service, provided that AT&T shall not be responsible for any delay or failure in performance hereunder caused by fires, strikes, embargoes, requirements imposed by Government regulations, civil or military authorities, acts of God or by the public enemy or other similar causes beyond such party's control.

J. AT&T Pennsylvania Telecommunications Relay Services are subject to the availability of facilities and billing.

K. The service is furnished subject to the condition that it will not be used for an unlawful purpose. Service will be discontinued, without liability to AT&T if any law enforcement agency, acting within its apparent jurisdiction, advises in writing that such service is being used in violation of the law. AT&T will refuse to furnish service when it has reasonable grounds to believe that such service will be used in violation of the law.

L. A discount will be provided for all intrastate calls placed through the Relay Center. This discount applies to customers with hearing and/or speech disabilities and those without.

OFFICIALLY FILED TARIFF

TELECOMMUNICATIONS RELAY SERVICES

1.1. AT&T PENNSYLVANIA TELECOMMUNICATIONS RELAY SERVICES (Cont'd)

1.1.5. Relay Center Communications Assistant

A. Except for billing purposes, communications assistants will not reveal information of any call, including the fact that the call occurred.

B. Communications assistants shall convey the full and exact content of all communications they are relaying.

C. Communications assistants must relay all conversations verbatim unless the relay user specifically requests summarization.

D. Communications assistants shall not counsel, advise or interject personal opinions or additional information into any communications which they are relaying.

E. Communications assistants are available to accept and relay calls in English and the written syntax (speech idioms) of American Sign Language (ASL).

F. At the request of the originating caller, communications assistants will attempt to complete calls 3 consecutive times when encountering busy signals.

G. Communications assistants will not refuse single or sequential calls.

H. Communications assistants will not disconnect a call against the wishes of the originating party except in those instances in which the caller is abusive to or intentionally uncooperative with the Relay Center communications assistants.

I. Upon receiving an emergency call from a TTY user, the communications assistant will automatically and immediately transfer the caller to the nearest Public Safety Answering Point (PSAP). In addition, the Communications Assistant must pass along the caller's telephone number to the PSAP when a caller disconnects before being connected to emergency services.

J. Any paper printouts or electronic records of the content of Relay Center assisted conversations will be destroyed by the Relay Center at the completion of the call.

OFFICIALLY FILED TARIFF

AT&T COMMUNICATIONS
OF PENNSYLVANIA, LLC

Supplement No. 2 to
Pa. P.U.C.-No. 24
Section 1
2nd Revised Sheet 5
Canceling 1st Revised Sheet 5

TELECOMMUNICATIONS RELAY SERVICES

1.1. AT&T PENNSYLVANIA TELECOMMUNICATIONS RELAY SERVICES (Cont'd)

1.1.6. Methodology for Designing Prices

End-user prices are reflected as if the caller directly dialed the called number, without passing through the Relay Center. End-user prices for calls which originate and terminate in the Commonwealth of Pennsylvania will apply as shown in Section 1.1.10 of this tariff. (C)

Price schedules and discounts for all other calls are found in AT&T Consumer Services Guides located at www.att.com/serviceguide/home. Interstate Relay Service calling will be available to customers within 30 days of the Commission's Order dated November 6, 1991.

Recurring fixed and variable expenses incurred by AT&T shall be recovered on a monthly basis from the Commission approved Fund Administrator. AT&T shall be reimbursed for recurring expenses based on the actual monthly call volume experienced multiplied by the price per minute figure at the appropriate call volume (i.e., total minutes per month) as provided in Table A. A minimum floor of 200,000 minutes/month will be allowed for the first six months of operation should the monthly call volume not reach 200,000 minutes.

The methodology used to establish the price for Relay Service includes start-up costs, recurring fixed and variable expenses, overhead costs, and profit margin consistent with the P.U.C.'s orders approving the RFP for AT&T Pennsylvania Telecommunications Services.

OFFICIALLY FILED TARIFF

TELECOMMUNICATIONS RELAY SERVICES

1.1. AT&T PENNSYLVANIA TELECOMMUNICATIONS RELAY SERVICES (Cont'd)

1.1.6. Methodology for Designing Prices (Cont'd)

A. Start-up Costs

Start-up costs include the design and planning of facilities; prepurchase down payments; procurement of facilities; hiring and training of communications assistants; building and rent renovation; installation and testing of equipment and facilities. Start-up costs incurred by AT&T are equally expensed over the first eleven months of the Relay System's operation.

B. Recurring Fixed Expenses

Recurring, varying, non-usage based charges attributable solely to the Relay System include: building rent, maintenance and utilities; carrying and maintenance charges for building, furniture, office equipment and telecommunications equipment; and administration.

C. Recurring Variable Expenses

Usage-band charges of calls, attributable solely to the Relay System include: wages, salaries and benefits for operations; telecommunications expenses for incoming and outgoing calls; miscellaneous office expenses (supplies, postage, delivery, etc.); miscellaneous staff management expenses (travel, education, etc.); relay center management staff and other overhead expenses.

A surcharge will be applied as ordered by the P.U.C. to fund the provisioning of the Pennsylvania Relay System. This surcharge may be adjusted annually or as appropriate based on funds collected and the costs of operating the Pennsylvania Relay System. The surcharge and virtual call revenues will be collected as ordered by the P.U.C. These funds will be remitted monthly to a Pennsylvania Relay Fund Administrator for disbursement to AT&T. Recurring expenses incurred by AT&T shall be recovered on a monthly basis. The responsibilities of the Fund Administrator are outlined in Section 1.1.8. of this tariff.

OFFICIALLY FILED TARIFF

AT&T COMMUNICATIONS
OF PENNSYLVANIA, LLC

Pa. P.U.C.-No. 24
Canceling Pa. P.U.C.-No. 9
Section 1
Original Sheet 7

TELECOMMUNICATIONS RELAY SERVICES

1.1. AT&T PENNSYLVANIA TELECOMMUNICATIONS RELAY SERVICES (Cont'd)

1.1.6. Methodology for Designing Prices (Cont'd)

Table A: Recurring Price/Minute Schedule
Recurring Price/Minute of Operation
Minutes of Operation/Month: Price/Minute:

EXPURGATED

COPY

OFFICIALLY FILED TARIFF

FCC Docket No. CG 03-123
Application for Recertification of the Pennsylvania TRS
November 9, 2007
Page 227

ISSUED: January 30, 2003

EFFECTIVE: January 31, 2003

TELECOMMUNICATIONS RELAY SERVICES

1.1. AT&T PENNSYLVANIA TELECOMMUNICATIONS RELAY SERVICES (Cont'd)

1.1.7. Billing by AT&T

A. Billing Information Provided to Telecommunications Provider

The Relay Center shall create for each relay-assisted call an Extended Message Record (EMR) or Extended Message Interface (EMI). This record shall contain, at a minimum, the following information:

- telephone number or credit card number to be billed
- terminating telephone number
- originating telephone number
- date
- starting and ending time of call
- call type

AT&T shall forward the EMR/EMI for each call to the appropriate telecommunications provider or the location designated by such provider within fourteen days that such service is supplied.

OFFICIALLY FILED TARIFF

TELECOMMUNICATIONS RELAY SERVICES

1.1. AT&T PENNSYLVANIA TELECOMMUNICATIONS RELAY SERVICES (Cont'd)

1.1.8. Fund Administrator

The Pennsylvania Relay System Fund Administrator will be confirmed by the P.U.C. and will have the following responsibilities:

- to receive monthly from each local exchange carrier the funds they have collected from their customers through the surcharge. (C)
- to disburse to AT&T payments from the fund
- to monitor for and ensure a positive cash flow to the fund and achieve a reasonable return on the collected but undisbursed monies in the fund
- to notify the P.U.C. and AT&T of the level of money in the fund and to alert the P.U.C. when the fund is approaching exhaustion
- to keep a monthly record of monies received from each telecommunications provider and monies disbursed to AT&T
- issue monthly reports on the financial status of the fund to the Commission

OFFICIALLY FILED TARIFF

TELECOMMUNICATIONS RELAY SERVICES

1.1. AT&T PENNSYLVANIA TELECOMMUNICATIONS RELAY SERVICES (Cont'd)

1.1.9. Reporting Requirements

AT&T shall be responsible for maintaining all records and reports relating to the operation of the Relay System. Such reports shall include, but are not limited to, the following:

- blockage rates (number of calls reaching a busy signal when calling the relay center)
- number of calls in queue
- length of time calls are held in queue
- traffic patterns identifying:
 - area codes from which the calls originate
 - percentage of calls originated by TT users
- percent of occupancy
- average speed of answer of Relay Center communications assistant
- number of calls and minutes of use experienced by the Relay Center on a monthly basis.

AT&T shall provide to the P.U.C. a quarterly report of operations, service standards and traffic patterns of the Relay System. This report shall include, but is not limited to, the information described in 1.1.9. above.

AT&T shall also be responsible for maintaining the accounting and financial records detailing the expenses incurred in operating the Relay System. AT&T shall maintain these records in accordance with generally accepted accounting principles.

OFFICIALLY FILED TARIFF

AT&T COMMUNICATIONS
OF PENNSYLVANIA, LLC

TELECOMMUNICATIONS RELAY SERVICES

1.1. AT&T PENNSYLVANIA TELECOMMUNICATIONS RELAY SERVICES (Cont'd)

1.1.10. Telecommunications Relay Service (TRS) Pricing

A. Eligible Calls - AT&T Dial Station calls placed and billed by the Relay provider through the Pennsylvania Relay Service are eligible for the rates specified below and shall be billed to the caller.

B. Prices

For Customers subscribed to an AT&T Optional Calling Plan, with the exception of the AT&T True Reach Plan*, Direct Dialed Station and Calling Card TRS calls are billed at the same rate as the Customer's plan.

For Relay Customers who are not subscribed to an AT&T Optional Calling Plan or who are subscribed to the AT&T True Reach Plan, Direct Dialed Station TRS calls are billed at \$.07 per minute.

TRS calls placed from a public or semi-public payphone and billed to an AT&T CIID/891 Card, Local Telephone Company Card or Commercial Credit/Charge Card are billed at \$.05 per minute, or fraction thereof, with no per call service charge.

TRS calls (non-payphone calls) billed to an AT&T CIID/891 card, or a Local Exchange Company Card or a Commercial Credit/Charge Card are billed at basic calling card rates.

Operator-Handled Calls are billed at basic operator handled rates.

There is no monthly recurring charge or usage minimum charge that applies. Customers are also eligible for threshold billing. Customers do not have to be presubscribed to AT&T to be eligible for this offer.

*The True Reach discounts apply to in-state calls.